RCRA Compliance Evaluation Inspection

Standard Steel, LLC
500 North Walnut Street
Burnham, PA 17009

Mifflin County

RCRA Identification Number: PAD061106209
SIC Code: 3312

Date of Inspection: May 24, 2005

EPA Representatives:	Jan P. Szaro, Environmental Engineer RCRA Compliance & Enforcement Branch (215) 814-3421
	Martin Matlin, Environmental Scientist RCRA Compliance & Enforcement Branch (215) 814-5789
Facility Representatives:	Blair Echard, Manager – Plant Engineering (717) 248-4911

Jan P. Szaro
Waste & Chemicals Management Division
July, 2005

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1.0 Introduction

On May 24, 2005, the United States Environmental Protection Agency, Region III (EPA), Waste and Chemicals Management Division, RCRA Compliance and Enforcement Branch (RCEB) conducted an unannounced Compliance Evaluation Inspection (CEI) under the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Sections 6901 et seq. of Standard Steel, LLC. Pennsylvania Department of Environmental Protection (PADEP) representatives were invited but could not be present to accompany USEPA representatives Jan Szaro and Martin Matlin on the inspection. The facility was represented by Blair Echard, Manager – Plant Engineering.

The inspectors arrived at the facility at 8:45 AM on May 24th and announced their presence to Mr. Echard using the intercom system in the unmanned reception area. Mr. Echard came down to the reception area and the inspectors presented their credentials. Mr. Echard then conducted us upstairs to the Engineering section where he maintains an office and showed us to a conference table. Mr. Szaro then explained the purpose of the RCRA Subtitle C inspection to be conducted at the facility. The inspection included an evaluation of the facility's forging processes and compliance with the federally authorized Pennsylvania Code Title 25, Hazardous Waste Management System (PA Title 25) and RCRA.

All information included in this report are the results of statements made by the facility representatives, materials shown to the inspectors by the facility representatives during the inspection, information and documents provided by the facility representatives to EPA during or after the inspection, and a review of the facility's EPA and State records. An EPA Generator Checklist was completed as part of the inspection and has been included as Attachment 1 to this report.

2.0 General Facility Information

2.1 Description of Facility

Standard Steel, LLC is located at 500 North Walnut Street, Burnham, Pennsylvania. The facility produces and ships wheels and axles for use by the railroad transportation industry. Within the past year the facility exited the ring mill process of wheel manufacture. Part of this process included an acid etching operation which resulted in creating a K062 spent pickle liquor waste stream. This stream was collected in a 1200 gallon tank and hauled away as Hazardous Waste. The tank was emptied on 1/31/05 and has remained empty since that date.

The facility began operations in 1795 as Freedom Forge and has remained a forging operation since its inception. After several iterations, the company name changed to Standard Steel in 1875. In 1972, Standard Steel was purchased by Titanium Metals

Corporation of America, then was incorporated as Freedom Forge in 1981. Along the way in 1976, Latrobe Forge and Spring Company, an electric-furnace steel producing and forging plant in Latrobe, PA, was purchased. Freedom Forge filed for bankruptcy in 2001 and Standard Steel, LLC emerged from Chapter 11 in 2002 after being acquired by Farrell and Company. The Latrobe facility was closed in 2004 and sold to Lehigh Specialty Melting, Inc., a subsidiary of the Park Corporation.

Standard Steel, LLC is a privately owned entity. The Chief Executive Officer is Michael Farrell who is located in Pittsburgh, PA. Three (3) Senior Vice-Presidents represent top management at the Burnham facility. They are:

John Cummings – Manufacturing
John Hilton – Sales and Marketing
Dana Patterson – Finance and Human Resources

The facility occupies approximately 268 acres in Mifflin County, Pennsylvania and currently employs about 600 employees that operate in 3 shifts and keep the manufacturing operation running around the clock 6 days per week. The offices and support staff work on a single shift as does the K061 EAF Baghouse Dust trailer loading operation. The facility is bounded by Freedom Avenue, Walnut Street, Beech Street, Yeagertown Road and the Kishacoquillas Creek. More detailed general information, including a map of the facility is included as Attachment 2.

2.2 Compliance History

The Comprehensive Compliance Monitoring and Enforcement Report is included as Attachment 3. EPA has not previously conducted a RCRA Compliance Evaluation Inspection (CEI) at this facility. The State has conducted an annual Hazardous Waste inspection at the facility since 2001. In 2003, a PPC plan revision was found not to have been distributed and in 2002 problems were found with the weekly inspection logs for the Hazardous Waste storage area. No records of enforcement actions were found as a result of these inspections.

3.0 Permit Status

Based on a review of the facility's manifests for 2001, 2002, 2003 and 2004, the Standard Steel facility is a Large Quantity Generator (LQG) of hazardous waste. The facility is not permitted to store, treat or dispose of hazardous waste and is therefore subject to the less than 90-day generator requirements under the PA Title 25. The facility does have four (4) NPDES discharge permits to discharge the effluent from four (4) separate Waste Water Treatment areas to the Kishacoquillas Creek. Kishacoquillas Creek is a tributary of the Juniata River which is a tributary of the Susquehanna River. The facility also has a Residual Waste permit for slag disposal and operates an onsite landfill. An accounting of the residual wastes generated by the facility in 2004 is included as Attachment 4 as is a facility produced assessment of the waste streams generated by the facility.

4.0 Process Description

The primary product of the facility is carbon steel wheels and axles for the railroad transportation industry. To begin the process the facility first produces carbon steel ingots from scrap metal (strictly carbon steel variety). The quality of the steel is paramount in order to obtain the hardness required of RR wheels and axles. The scrap metal raw material is brought onsite via rail cars and trucks. A magnet loads the scrap metal into scrap charging cars. The load is then pulled by a locomotive and run over a scale to get the correct charging weight for the Electric Arc Furnace (EAF) that is going to be used. Three (3) EAFs are used at the facility, one (1) 75-Ton unit and two (2) 40-Ton units. Standard operating procedure at the facility is for two of the units to be in operation while the 3rd unit undergoes maintenance.

The scrap metal charge is melted in the furnace and then discharged into a ladle. The molten steel is then bottom poured from the ladle into molds where the molten material cools into approximately 10 foot long cylindrical ingots. The feeder tubes are cut off the ingots after which the ingots are transported by rail car to the Wheel Mill.

Band saws in the wheel mill saw cut the ingots into approximately 1 foot thick rounds. The ingot rounds are then loaded into a rotary furnace in rows of five. The rounds slowly rotate in the furnace as they are brought up to a temperature of 2200 degrees Fahrenheit. As each ingot round is removed from the furnace it is hit with a high pressure water descaler to remove the scale from the periphery of the round. The round then enters a 10,000 ton press where the resultant wheel is forged one side at a time. The press is sprayed with liquid graphite before each and every use so that the steel does not adhere to the press.

Upon removal from the press the wheel goes on to the Rolling process where the diameter of the wheel is increased. Next is the finish sizing operation where a 6,000 ton press is used to forge a S-plate wheel into the hub. The center of the wheel is punched out and a serial number is stamped on. The wheel then enters the retard cooling furnace.

After leaving the furnace the wheel goes to Machine Shop 1 for heat treating in natural gas furnaces in order to harden it. The tread is then spray cooled to further increase the hardness. Next is the shot blast operation where the wheel is shot-peened with steel shot to give a little compressive service to it. A final machining is performed before the wheel is then inspected and readied for shipping.

The axle forging operation follows essentially identically to the wheel forging operation. Usually, only the 40-ton EAFs are used for the axle operation.

5.0 Hazardous and Universal Waste Generation

Before beginning the inspection Mr. Echard explained that the facility has exited the ring mill process. The significance is that their generation of the K062 listed waste was primarily from this process. The tank that held this waste was pumped out and shipped on 1/31/05. The tank has remained empty since that date. There is still one active acid etching tank in the Metallurgical Lab Annex which would be the genesis of this type of waste. Mr. Echard advised that it is now so seldomly used that this type of waste will very rarely be generated.

There are four (4) separate areas where wastewater from high-pressure water blasting operations is treated. The effluent from the WWT area is discharged to the Kishacoquillas Creek by NPDES permit and the filter cake from the WWT filter process is disposed as non-hazardous waste at the Allied/BFI Carbon Limestone landfill in Lowellville, OH.

5.1 Hazardous Wastes

* **K061 EAF Baghouse Dust** – This is a product of the melting operation in the electric arc furnaces. It is a listed waste produced from the emission control dust/sludge from the primary production of steel in electric furnaces.

* **Safety Kleen parts cleaner solvent** – There are 23 of these units located throughout the complex that are serviced by Safety Kleen. The waste solvent is collected in 55 gallon containers.

* **Electric Shop Parts Cleaner** – The parts cleaner in this area is not a Safety Kleen unit. It uses mineral spirits from Marisol Corp. Waste from this unit is collected in a 55 gallon container and shipped to Marisol.

* **K062 Acid Etching Waste** – Tank had been emptied on 1/31/05 and remains empty. There is still one active etching tank in very limited use and one associated rinse tank. The materials do not become a hazardous waste until they are determined to be no longer usable and are then pumped into the 1200 gallon K062 waste tank. The tank is then dated with an accumulation start date on the date the first material is pumped into it.

5.2 Universal Wastes

* **Used Lamps** – Mr. Echard stated that used lamps are collected in the Electrical Shop. Hite Electric takes the bulbs for recycling.

* **Used Batteries** – These are collected outside of the maintenance building. They have an agreement with an outside vendor, East Penn Manufacturing of Lyon Station, PA, who takes the batteries for reclamation.

* **Used Oil** – There are two (2) 6,000 gallon aboveground storage tanks (AST) for the collection of used oil which are located in the Axle Shop building. The tanks are differentiated by the water content of the oil. Used hydraulic oil and mineral oil are collected in one tank while high water content oil (machine tool cutting oil that is greater than 90% water content) is collected in the other. Material from both ASTs are picked up by Environmental Recovery, Incorporated of Lancaster, PA.

6.0 Inspection Observations

6.1 K061 EAF Baghouse Building

Mr. Echard escorted the inspectors to the K061 EAF Baghouse building. Fumes from the EAFs are ducted to this building through a 10-foot diameter pipe. The fumes contain dust which is collected in a silo in an inner enclosed area of the building. An operator, Robert Shilling at the time of the inspection, supervises the rest of the operation which is only operational during the first shift. Dust from the silo enters a rolling bin similar to a small concrete mix tank. Water is introduced to the mixer to pelletize the dust. The pellets work their way out of the top of the mix tank and flow into a bin similar to a small trash dumpster (PHOTO 5 of the Photographic Log included as Attachment 5). When the bin is nearly full, the operator shuts the silo feed and takes the bin by forklift to a trailer parked inside the building (PHOTO 3). He dumps the bin into the trailer, returns the bin to its original position and restarts the silo feed. During the other shifts the K061 dust is stored in the silo awaiting the first shift restart of operations.

There is a sign on the building that reads "Hazardous Waste Storage Electric Arc Furnace Dust K061" (PHOTO 4). The trailer in the building, # 4011Y at the time of inspection, was not labeled with the contents of the trailer or with the words "Hazardous Waste". There was a tarpaulin available at the top of the trailer but it was not being used to keep the trailer covered when Hazardous Waste was not being added to the trailer. The trailer was about half full at the time of inspection (PHOTOS 6 & 7). Mr. Shilling stated that he dumps a bin of the pelletized dust into the trailer about six (6) times per day, eight (8) times per day when the facility is real busy. Mr. Echard stated that the facility had an agreement with PADEP that the trailer did not need to be kept covered as long as the trailer was inside the building. He also stated that there was also another agreement with PADEP that the trailer did not have to be labeled while it was inside the building. This arrangement is alluded to in the copy of the report of the 3/31/04 PADEP inspection that is included as Attachment 6.

A second trailer was observed parked outside of the building, # 4014Y (PHOTOS 12 & 13). This trailer was observed to be full and was covered with a tarpaulin. No

labeling was observed on this trailer as to its contents even though it was no longer inside the K061 Baghouse building.

6.2 Melt Shop

Material is taken off of the top of the ladle as it can contain some undesirable metal content. The slag is allowed to cool and then transferred to the onsite residual landfill. Foundry sand is used to isolate the outside of the mold from the molten steel. Used foundry sand and used refractory from rebricking of the furnaces is sent to the onsite residual landfill. Analyses are included as Attachment 7.

The feeder tubes from the pouring operation are torch cut off with the fumes (mostly metal oxides) being collected at the torch cutoff baghouse. This type of torch cutoff process is performed at several locations in the complex with the fumes all going to this one baghouse. The dust is collected in a roll-off container that is taken to the onsite residual waste landfill for disposal.

Carbon electrodes are used in the EAFs. These electrodes are primarily constructed of graphite and are used to transfer the supplied electrical power in the EAFs to the metal charge which causes elevated temperatures which melts the metal. The electrodes are normally consumed during the process. Broken or damaged electrodes are returned to the vendor for reclamation. Some small electrode fragments are disposed in the onsite residual waste landfill.

There are 23 Safety Kleen parts cleaners located throughout the complex. The facility has a contract with Safety Kleen to service these units on a regular schedule. Mr. Echard stated that he would be initiating an effort to reduce the number of these units at the facility.

6.3 Wheel Mill

First operation in the wheel mill is to saw cut the ingots into rounds. The grinding and cut-off wheels used for these purposes wear out frequently and are sent to the onsite residual waste landfill for disposal. The metal produced by the cutting and grinding is collected in containers and baghouses as reclaimable swarf and dust. Cutting oil used in the process goes into the wastewater generated in this building.

At the forging operation liquid graphite is sprayed onto the dies before each usage. The graphite gets into the wastewater stream when the die is water blasted after each usage. As each round is brought out of the rotating furnace at 2200 degrees Fahrenheit it is high pressure water blasted to remove the mill scale that forms on the surface of the round. The mill scale is periodically removed from the wastewater sump.

6.4 Machine Shop 1

There are two shot blast stations used as part of this operation (PHOTO 24). Steel shot is used and reused until it gets too small to be of further use. The spent shot and the dust generated by the operation is collected and stored outside in a concrete bunker (PHOTO 22).

6.5 Axle Shop

Processes and wastes here are duplicates of the Wheel Mill. The differentiation is that RR axles are produced here whereas RR wheels are produced in the Wheel Mill.

One bay of the Axle Shop is occupied by the Waste Oil area. There are two 6,000 gallon ASTs here, one for waste oil and one for oily water (PHOTO 30). Drums of both materials are brought here and left to be pumped into the appropriate tank. At the time of inspection four (4) drums of liquid were observed next to the oily water AST. The drums were open and were not labeled (PHOTOS 31-34).

To the rear of the Axle Shop is where the Electrical Shop is located. There is one (1) parts cleaner station located here that is not managed by Safety Kleen. Mineral spirits supplied by Marisol is used in this parts cleaner as the operator of this station finds it to be more effective. A 5 gallon bucket is used to drain the waste solvent from the station. At the time of inspection the bucket was found to be open and unlabeled. There was about 1 inch of material in the bucket which the operator said was generated the day of inspection. The bucket is emptied into a 55 gallon container which was closed and labeled.

Used fluorescent bulbs are collected in the Electrical Shop. At the time of inspection four (4) boxes of bulbs were observed. The boxes were not closed, labeled or dated (PHOTOS 28 & 29).

6.6 Metallurgical Lab Annex

There is an acid etching operation conducted in this building. There are two (2) separate stations for this process. Each station consists of two (2) tanks, one for the muriatic acid (50% muriatic acid/ 50% water) and one for a water rinse (5% muriatic acid/ 95% water). At the time of inspection only one station was operational (PHOTO 40), the other consisted of empty tanks. There is also a 1200 gallon tank in the room that is used for K062 Hazardous Waste. This waste is generated when the material from one of the acid etching stations is spent. The material is pumped to the 1200 gallon AST. The tank is then dated when the first material is pumped into it. The tank was last emptied on 1/31/05 (PHOTOS 42 & 43). No material has been added to the tank since that time. The ring mill operation was the primary source of this waste stream. The ring mill operation was closed down in 2004. The one acid etching operation is still existent for sporadic testing of metal quality. Mr. Echard stated that the facility plans to further reduce the size of the acid etching operation and that the K062 waste stream would become almost nonexistent.

6.7 Wastewater Treatment

Wastewater from the forging processes is collected in skimmer pits equipped with oil/water separators. Solids will settle to the bottom of the pits and are removed as skimmer pit sludge during cleanout operations which occur during the annual July facility shutdown. This sludge is sent off as residual waste to the American Landfill in Waynesburg, OH. Oil is removed from the surface of the skimmer pits by use of tubular skimmers. This material is collected and pumped into the 6,000 gallon oily water AST in the Axle Shop building. Two of the skimmer pits are equipped with Dispersed Air Flotation (DAF) units which blow air into the skimmer pit causing the oil to more easily come to the surface where it can be removed by the tubular skimmers. Dirty water from the top of the DAF unit is then pumped to a thickening tank. Here ferric chloride is added to help precipitate out mill scale and lime is added to adjust the pH. Periodically the bottoms of the thickening tank are sent to a filter press. The filter press produces a charcoal briquette like product that is collected in a roll-off trailer (PHOTOS 19-21) and sent off as a residual waste to American Landfill in Waynesburg, Ohio. The wastewater is discharged into the Kishacoquillas Creek.

7.0 Records Review

7.1 Manifests

Manifests for the calendar years 2001, 2002, 2003, 2004 & 2005 were reviewed as part of this inspection. Based on the manifests and confirmed by the biennial reports the Standard Steel facility would be categorized as a Large Quantity Generator of hazardous waste. The facility's manifests were in very good order. Land Disposal Restriction forms were also checked and found to be in good order.

7.2 Inspection Logs

Hazardous Waste Tank – A log is kept on the tank. The log was checked for the last five years. The log appeared to be complete but done on what appeared to be a weekly basis as opposed to each business day. A copy of the May Daily Tank Inspection Record is included as Attachment 8.

Less Than 90-Day Hazardous Waste Storage Area - A weekly log is kept on this area. The log was checked for the last five years and appeared complete. The only hazardous waste that is accumulated here is the used solvent from Marisol. Usually, the area is empty, material was present a maximum of 6 weeks out of the year for each of the records checked. A couple of weekly inspection records are included as Attachment 9.

K061 EAF Baghouse Building – Weekly logs are kept for the trailers in this area. Logs appeared complete but observed that two of the items being checked were that the trailers were 1) Hazardous Waste Marking on Trailer and 2) K061 Label in Place.

The trailers observed during the inspection on 5/24 were not in compliance with either of these two requirements.

7.3 Training

Training is conducted onsite by Mr. Dick Decker who attends outside RCRA training. Training records for 2002, 2003, 2004 and 2005 were reviewed and are included as Attachment 10. Mr. Robert Shilling, who was operating the K061 EAF Dust Hazardous Waste operation at the time of inspection, last received training in 2001. Mr. Echard stated that Mr. Shilling was not the usual operator. He stated that Mr. Tom Harris was the regular operator but that he had been out on disability since November of 2004. In his absence, Mr. Keith Ammerman (Mr. Harris's backup) had assumed the duties of being the regular operator. However, Mr. Ammerman was on vacation at the time of inspection. This inspector pointed out to Mr. Echard that the facility had been operating in this manner for six (6) without training a backup operator even though the facility had conducted annual training during that time period. Most of the personnel who sign the Hazardous Waste Manifests for the facility were observed to not have received annual training if any training at all. Personnel includes Larry Treaster, Valerie DeArment, Tom Ferenez, Jane Hamel, Tom Mohr, Lon Goss, Pete Wilson, Harold Wilson Jr, Jeffrey Sulouff. and Jack Armstrong.

The facility did not appear to have job descriptions as relates to Hazardous Waste responsibilities. An outline of training presented is included as Attachment 11.

7.4 Contingency

The facility presented its PPC plan which was noted to be missing the addresses of the Emergency Contacts and letters of agreement with the local authorities..

8.0 Closing

Areas of concern raised are as follows:

1) The trailers of K061 baghouse dust not labeled or dated.

2) The trailer of K061 baghouse dust inside the building was not covered.

3) K061 Hazardous Waste operator, Robert Shilling, did not receive RCRA training since 2001. Most facility personnel who sign the Hazardous Waste manifests have received little or no training.

4) Lack of job descriptions for facility personnel as relates to Hazardous Waste operations.

5) Lack of Emergency Contact addresses and letters of agreement with local authorities in the Contingency Plan.

6) The open and unlabeled bucket of Marisol solvent at the parts cleaner station in the Electrical Shop.

7) The unlabeled and open containers of fluorescent bulbs in the Electrical Shop.

8) The open and unlabeled 55 gallon containers next to the Used Oil ASTs in the Axle Shop building.

9.0 Attachments

1. EPA Generator Checklist
2. General Facility Information
3. Comprehensive Compliance Monitoring & Enforcement Report
4. 2004 Residual Waste Accounting
5. Photographic Log
6. Copy of report from 3/31/04 PADEP inspection
7. Waste Analyses
8. May 2005 Hazardous Waste Tank Inspection records
9. K061 EAF Dust trailer inspection records for weeks ending 4/24/05 & 5/15/05
10. Training Records
11. Training Outline

ATTACHMENT 1

EPA GENERATOR CHECKLIST

Name of Facility: STANDARD STEEL, LLC

Address of Facility: 500 NORTH WALNUT ST
BURNHAM, PA

EPA I.D. Number: PAD061106209

Name/Title of Facility Representative: Blair Echard, Manager - Plant Engineering

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I. General

1. Provide a brief description of the type of operation(s) that produces hazardous waste at this facility:

Forging operation that creates K061 baghouse dust
23 Safety Kleen parts cleaners serviced by Safety Kleen
1 parts washer with mineral spirits
K062 spent pickle liquor from acid etching operation

2. Does the facility perform the following on-site:

a. storage (>90 day or >180 day for SQG) of hazardous waste? yes (no)

b. treatment of hazardous waste? yes (no)

c. disposal of hazardous waste? yes (no)

(if yes, complete appropriate TSD checklists)

261.4

3. Is the facility subject to any exclusions for its hazardous waste? yes (no)

If yes, list the waste and the basis for exclusion:

_____

_____

262.11(c)
4. Has the facility properly determined whether all of its waste exhibits any of the characteristics of hazardous waste? (yes) no

If yes, describe what this determination was based upon (i.e., testing or knowledge of process/materials used).

_____

_____

If no, describe omissions:

_____

_____

5. Has the facility failed to notify EPA/State of any of its hazardous waste management activities, including locations of all hazardous waste accumulation areas? yes (no)

If yes, describe: _____

_____

_____

_____

II. Manifest

Complete this section only if facility ships hazardous waste off-site.

262.20(a)
1. Does the facility use the Uniform Hazardous Waste Manifest whenever transporting hazardous waste? (yes) no

If no, explain: _____

_____

_____

If yes, review a representative number of manifests and indicate whether they contain:

a. Generator's name, mailing address, telephone number and EPA ID number? yes no

b. Transporter's name and EPA ID number? yes no

c. DOT waste description, including proper shipping name, hazardous waste class and DOT identification number? yes no

d. Number and type of containers (if applicable)? yes no

e. Quantity of each waste transported? yes no

f. Name, EPA ID number and site address of facility designated to receive the waste? yes no

g. The following certification? yes no

"I hereby declare that the contents of this consigment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment."

262.23(a)
2. Did the generator:

a. Sign and date the manifest? yes no

b. Obtain the handwritten signature and date of acceptance from the initial transporter? yes no

c. Ensure that return copies of the manifest from the designated TSD facility were properly signed and dated? yes no

d. Retain a copy of the signed manifest for at least three years? (yes) no

The inspector should obtain copies of <u>any</u> manifests that are found to have problems.

III. Pre-Transport Requirements

Complete this section only if the facility ships hazardous waste off site.

1. Is there any indication that the facility is:

262.30
a. Not packaging its waste in accordance with DOT regulations (49 CFR Parts 173, 178 and 179)?
yes (no)

262.31
b. Not labelling each package in accordance with DOT regulations (49 CFR Part 172)? yes (no)

262.32(a) & (b)
c. Not marking each container of 110 gallons or less with the words "hazardous waste -----" or each package of hazardous waste in accordance with DOT regulations (49 CFR Part 172)? yes (no)

If yes, explain:_____

_____

_____

_____

262.33
2. Does the facility placard or offer the transporter placards for its hazardous waste shipments? yes (no)

IV. Waste Accumulation

1. Does the facility utilize the following types of hazardous waste accumulation:

a. Satellite accumulation? (yes) no

b. Less than 90 day storage? (yes) no

Answer the following questions if the generator has satellite accumulation area(s).

262.34(c)(1)
2. Is satellite accumulation area(s) near the point of waste generation and under the control of the operator of the process actually generating the waste? (yes) no

If no, describe: _____

_____

_____

_____

262.34(c)(1)
3. Are there multiple satellite accumulation areas for any one process that generates hazardous waste? (yes) no

If yes, describe: _____

_____

_____

_____

262.34(c)(1)
4. Is the waste stored in container(s)? (yes) no

265.171
5. Are container(s) in good condition? (yes) no

If no, explain: _____

_____

_____

_____

262.34(c)(1)
6. Are container(s) marked with the words "hazardous waste" or the actual contents of the container(s)? (yes) no

265.173(a)
7. Are container(s) kept closed? yes (no)

265.171
8. Are any container(s) leaking? yes (no)

If yes, describe: _____

_____

_____

_____

262.34(c)(1)
9. Has the facility accumulated more than 55 gallons of hazardous waste or more than 1 quart of acutely hazardous waste in a satellite accumulation area? yes (no)

If yes:

262.34(c)(2)
a. Are the container(s) holding excess waste dated as to when accumulation began? yes no

b. Does the excess waste comply with the less than 90 day storage requirements (40 CFR Part 262.34(a)) within three days of the time when accumulation of such excess waste began? yes no

Answer the following questions if the facility has less than 90 day storage.

262.34(a)(4)
10. Does the facility maintain personnel training and other records required in 40 CFR Part 265.16? (yes) no

If yes, do these records include:

265.16(d)(1)
a. Job title for each position related to hazardous waste management and the employee filling each job?
yes (no)

265.16(d)(2)
b. A written job description for each position?
yes (no)

265.16(d)(3)
c. A written description of the type and amount of training that will be given to each person?
(yes) no

265.16(d)(4)
d. Records that document that the training or job experience required by facility personnel to effectively respond to emergencies and otherwise manage hazardous waste in a proper manner has been successfully completed?
(yes) no

265.16(b)
11. Have facility personnel successfully completed the required training or job experience within six months after occupying the position? (yes) no

265.16(c)
12. Do facility personnel take part in an annual review of the initial training requirements and update them as necessary?
yes (no) Not all personnel that need the training.

262.34(a)(4)
13. Does the facility maintain an adequate preparedness and prevention program as required in 40 CFR Part 265 Subpart C?
(yes) no

Is the facility equipped with:

265.32(a)
a. Internal communications or alarm system? (yes) no

265.32(b)
b. Telephone or hand-held two-way radio? (yes) no

265.32(c)
c. Portable fire extinguishers or other fire control equipment, spill control equipment and decontamination equipment? (yes) no

265.32(d)
d. Adequate volume of water? (yes) no

265.33
14. Does the facility test and maintain the above equipment to assure its proper operation? (yes) no

265.35
15. Is there sufficient aisle space to allow the unobstructed movement of personnel and equipment to areas where hazardous waste are located in the event of an emergency? (yes) no

265.37(a)(1)
16. Has the facility made arrangements with local authorities to familiarize them with the layout of the facility and the nature/hazards of the hazardous waste handled at the facility?
yes (no) No documentation.

262.34(a)(4)
17. Has the facility prepared a contingency plan and is it maintained at the facility? (yes) no

If yes, does it contain the following:

265.52(a)
a. Description of the actions that are to be taken in case of an emergency (all potential types of emergencies should be identified)? (yes) no

265.52(c)
b. Description of arrangements made with local authorities? yes (no)

265.52(d)
c. Current list of emergency coordinators' names, addresses and phone numbers (office and home)?
yes (no) No addresses

265.52(e)
d. List of all emergency equipment at the facility, including locations, descriptions and relevant capabilities? (yes) no

265.52(f)
e. evacuation plan for facility personnel? (yes) no

The inspector should obtain a copy of the facility's contingency plan if any problems are found.

265.53(b)
18. Were copies of the contingency plan submitted to local authorities that may provide emergency services? yes (no)

19. Has the facility's contingency plan ever failed in an emergency? yes (no) N/A

If yes:

265.54(b)
a. Was the contingency plan immediately amended?
yes no

265.54(c), (d) & (e)
20. Was the contingency plan amended when either the facility or its operations, list of emergency coordinators or list of emergency equipment had changed? (yes) no N/A

If no, describe: _____

_____

265.56(j)
21. If the contingency plan is implemented, does the facility record the time, date and details of the incident in its operating log and submit a written report of the incident to the Regional Administrator or the appropriate state agency within 15 days? yes no (N/A)

262.34(a)(1)
22. What is the method of waste storage:

Containers? (yes) no

Tanks? (yes) no

Containment Buildings? yes no

Other? (yes) no

If other, describe: K061 EAF baghouse dust is loaded into trailers parked inside the EAF baghouse building.

Answer the following questions if the facility uses container storage.

262.34(a)(2)&(3)
23. Are the container(s) marked with the words "Hazardous Waste" and the date that waste accumulation in that container begins? (yes) no

262.34(a)
24. Based upon accumulation dates, have any container(s) been in storage for more than 90 days? yes (no)

If yes, the inspector should complete the appropriate TSD checklists.

265.171
25. Are container(s) in good condition? (yes) no

If no, explain: _____

265.172
26. Are container(s) made of or lined with materials which will not react with or be incompatible with the waste they are storing? (yes) no

265.173(a)
27. Are container(s) kept closed? (yes) no

265.173(b)
28. Are containers(s) opened, handled or stored in a manner which may rupture the container or cause it to leak?
yes (no)

If yes, describe: _____

_____

_____

265.171
29. Are any container(s) leaking? yes (no)

If yes, describe: _____

_____

_____

265.174
30. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained?
(yes) no

If no, explain: _____

_____

265.176
31. Are container(s) holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? (yes) no N/A

32. Are incompatible wastes placed in the same container(s)?
yes (no)

If yes:

265.177(a) & 265.17(b)
a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxic emissions occurred? yes no

If yes, describe: _____

_____

_____

265.177(c)
33. Are container(s) holding incompatible hazardous waste properly separated or protected from one another while in storage? yes no (N/A)

If no, explain: _____

_____

_____

Answer the following questions if the facility uses tank storage.

262.34(a)(3)
34. Is the tank(s) labelled or clearly marked with the words "Hazardous Waste"? (yes) no

262.34(a)
35. Is the tank marked with the date that waste accumulation begins in that tank(s) or does the facility have in its records when waste accumulation started in that tank(s)?
(yes) no

262.34(a)
36. Based upon accumulation dates, has the facility stored hazardous waste in its tank(s) for longer than 90 days?
yes no Tank only used intermittently.

If yes, the inspector should complete the appropriate TSD checklists.

37. Which of the following describes the type of tank(s) employed at this facility (circle the appropriate one)?

a. Indoor - not on impermeable floor

(b.) Indoor - on impermeable floor

c. Outdoor - above ground

d. Outdoor - in ground

e. Outdoor - underground

38. What is the approximate age of the tank(s)?

_____

265.191
39. Does the tank(s) appear to be in good condition?
(yes) no can't tell

If no, describe: _____

_____

_____

265.191
40. Is the tank(s) leaking? yes no can't tell

If yes, describe: Tank not currently being used.

_____

_____

265.193
41. Is the tank(s) provided with an effective secondary containment system? (yes) no

If yes, describe: _____

_____

_____

If no:

265.191(a)
a. Does the facility have a written assessment reviewed and certified by an independent, qualified, registered professional engineer that attests to the tank(s)'s structural integrity? yes no

265.191(b)
42. Was a leak test performed on the tank(s)? yes no

If yes, provide date of most recent test: _____

265.194(b)
43. Is the tank(s) provided with adequate controls to prevent spills and overflows (i.e., automatic feed cutoff, bypass to another unit, high level alarms, etc.)? yes no

265.194(b)
44. Is there sufficient freeboard (2 feet) in uncovered tanks to prevent overtopping by wave or wind action or precipitation? yes no N/A

265.195(a)
45. Is the tank(s) inspected each operating day? yes no

If yes, do inspections include:

265.195(a)(1)
a. Overfill/spill control equipment? yes no

265.195(a)(2)
b. Aboveground portions of the tank(s) for corrosion or releases? yes no N/A

265.195(a)(3)
c. Data gathered from monitoring equipment and leak detection equipment? yes no

265.195(a)(4)
d. Area immediately surrounding the externally accessible portion of the tank(s) and secondary containment system for signs of erosion or releases? yes no N/A

265.195(b)(1)
46. Does the facility perform annual inspections of the cathodic protection systems, if present?
yes no (N/A)

265.195(c)
47. Does the facility properly document all of the results of its tank system inspections? yes no

265.196
48. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank from service immediately, failure to provide notification, etc.)? yes (no)

If yes, describe: _____

_____

_____

_____

49. Does the facility store any ignitable or reactive waste in its tank(s)? yes no

If yes:

265.198(a)(1)
a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste? yes no

265.198(a)(2)
b. Is the waste stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? yes no

265.198(a)(3)
c. Is the tank(s) used solely for emergencies?
yes no

265.198(b)
d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares?
yes no

If no, describe: _____

_____

_____

50. Is there any indication that incompatible wastes are being stored in a tank(s)? yes no

If yes:

265.199(a)
a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxics emissions occurred? yes no

If yes, describe: _____

_____

_____

_____

265.200(a)
51. Are waste analyses or trial treatment tests conducted whenever a tank system is used to store or treat a hazardous waste substantially different from waste previously treated or stored; or used to treat chemically a hazardous waste with a substantially different process than any previously used in that system? yes no N/A

If no:

265.200(b)
a. Has written, documented information on similar waste under similar operating conditions been obtained to show that the proposed treatment or storage will meet the requirements of §265.194(a) (i.e., hazardous waste or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment or the secondary containment system to rupture, leak, corrode or otherwise fail)? yes no

Answer the following questions if the facility uses containment buildings as a storage unit.
(effective February 18, 1993)

265.1101(a)(1) & (2)
52. Is the containment building(s) completely enclosed and designed and constructed of man-made materials that are of sufficient strength? yes no

If no, describe: _____

_____

_____

265.1101(a)(3)
53. Is there any indication that incompatible waste is being improperly stored in the containment buiilding? yes no

If yes, describe: _____

_____

_____

265.1101(a)(4)
54. Does the containment building(s) have a primary barrier that appears to be sufficiently durable and effective?
yes no

If no, describe: _____

_____

_____

55. Does the containment building manage hazardous waste containing free liquids? yes no

If no, skip to question 58:

265.1101(b)(2)
56. Is there a liquid collection and removal system available to prevent the accumulation of liquid on the primary barrier? yes no

If yes, describe the system and the presence/absence of collected liquids: _____

_____

_____

265.1101(b)(3)
57. Is there an effective secondary containment system (i.e., secondary barrier) and a leak detection system capable of detecting failure of the primary barrier? yes no

If no, describe: _____

_____

_____

58. Does the containment building serve as secondary containment for tank(s) placed within the building? yes no

If yes,

265.1101(b)(3)(iii)
a. Does it appear to meet the secondary containment system requirements for tanks described in §265.193 (i.e., must be compatible with waste, have sufficient strength and durability, and be designed to effectively detect and collect releases of liquid)? yes no

If no, describe: _____

_____

_____

_____

265.1101(c)(1)(i)
59. Is the primary barrier free of significant cracks, gaps, corrosion or other deterioration/openings? yes no

265.1101(c)(1)(ii)
60. Is the hazardous waste stored at a height that exceeds the height of any containment wall? yes no

265.1101(c)(1)(iii)
61. Is any hazardous waste tracked outside of the containment building by personnel or equipment? yes no

265.1101(c)(1)(iv)
62. Are any fugitive emissions exiting the containment building via doors, windows, cracks, vents, etc? yes no

265.1101(c)(2)
63. Does the facility have a certification for the containment building by a qualified registered professional engineer? yes no

64. Does the facility have an inspection plan for its containment building that establishes an effective inspection program, including a schedule that requires all monitoring/leak detection equipment to be inspected as well as checks for leaks/releases at least every 7 days? yes no

265.1101(c)(3)
65. Is there any indication that the containment building was improperly operated or maintained or that the owner/operator did not respond properly once the detection of a hazardous waste release occurred? yes no

If yes, describe: _____

_____

_____

_____

262.34(a)
66. Does the facility have written documentation showing that procedures are in place to ensure that individual additions and removals of waste to/from the containment building are consistent with the 90 day storage time limit that applies for all wastes managed in the unit? yes no

If waste is being stored in a containment building for greater than 90 days, the inspector should complete the appropriate TSD checklist.

V. Recordkeeping and Reports

262.42((a)(2)
1. Does the facility prepare an Exception Report and submit it to the Regional Administrator if a signed copy of the manifest is not received within 45 days of the date the waste was accepted by the initial transporter? yes no

If yes, does the Exception Report include:

a. Legible copy of the manifest? yes no

b. Cover letter explaining generator's efforts to locate waste and the results of those efforts? yes no

262.41(a)
2. If the facility ships any hazardous waste off-site, does it prepare a Biennial Report and submit it to the Regional Administrator by March 1 of each even numbered year?
yes no N/A

If yes, does the Biennial Report include:

262.41(a)(3)
a. Name, address and EPA ID number for each off-site TSD facility to which waste was shipped during the year?
yes no

262.41(a)(4)
b. Name and EPA ID number of each transporter used during the year? yes no

262.41(a)(5)
c. Description and quantity of each hazardous waste shipped off-site (listed by EPA ID number of each TSD facility to which it was shipped)? yes no

262.41(a)(6)
d. Efforts undertaken during the year to reduce the volume and toxicity of the waste generated?
yes no

262.41(a)(7)
e. Description of the changes in volume and toxicity of the waste actually achieved during the year?
yes no

262.40(a)(b)(c)
3. Does the facility retain copies of Biennial Reports, Exception Reports and test results/waste analyses for a minimum of 3 years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal?
(yes) no

A d d i t i o n a l C o m m e n t s :

ATTACHMENT 2

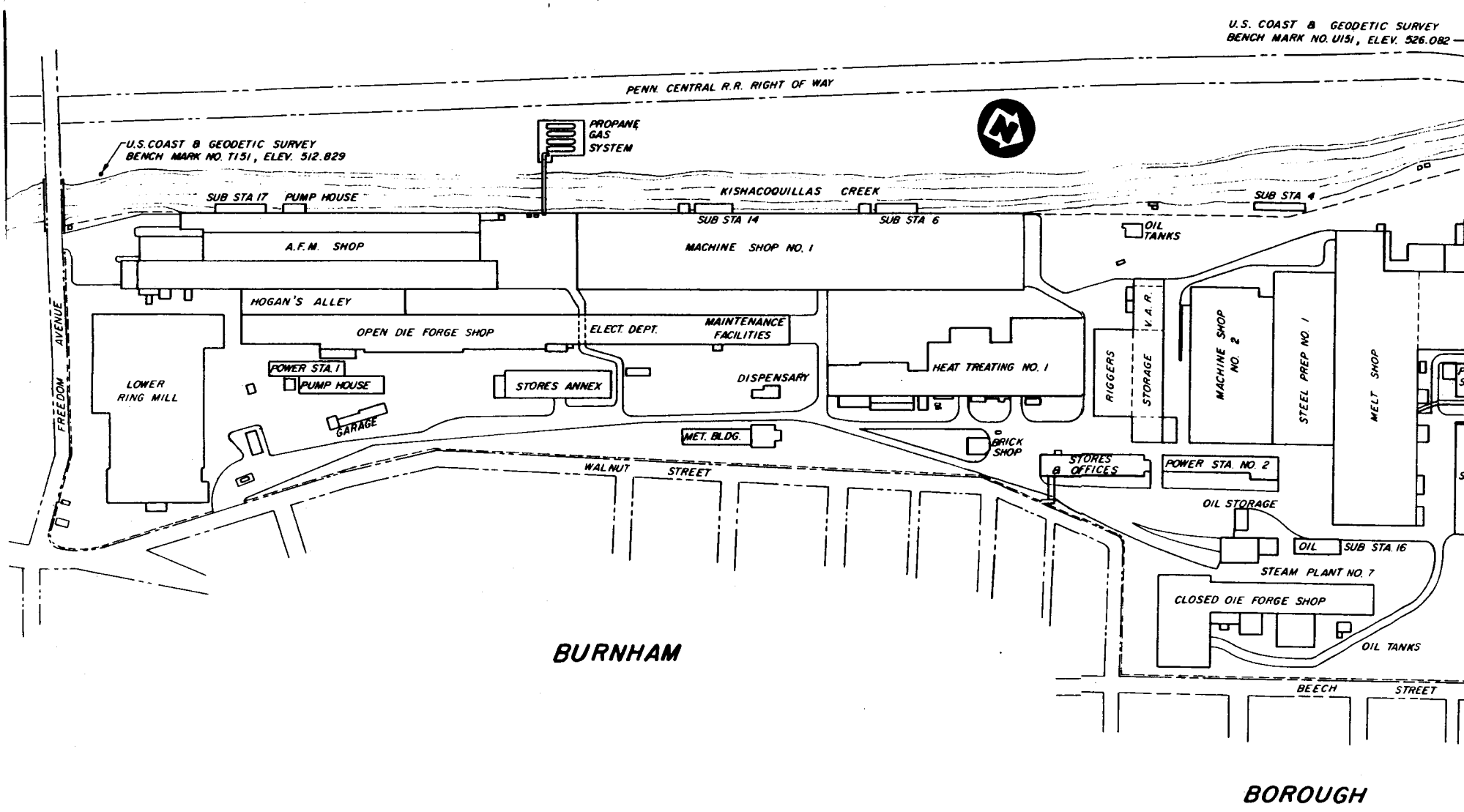
STANDARD STEEL

PLANT BUILDINGS

Melt Shop	129,920 Square Feet
Wheel Mill	78,000 Square Feet
Machine Shop No. 1	181,500 Square Feet
Axle Shop	121,100 Square Feet

Plant area inside fence 87 Acres

Total plant property approximately 268 Acres


U.S. COAST & GEODETIC SURVEY
BENCH MARK NO. U151, ELEV. 526.082
PENN. CENTRAL R.R. RIGHT OF WAY
U.S. COAST & GEODETIC SURVEY
BENCH MARK NO. T151, ELEV. 512.829
PROPANE GAS SYSTEM
SUB STA 17
PUMP HOUSE
KISHACOQUILLAS CREEK
SUB STA 14
SUB STA 6
SUB STA 4
OIL TANKS
A.F.M. SHOP
MACHINE SHOP NO. 1
HOGAN'S ALLEY
FREEDOM AVENUE
OPEN DIE FORGE SHOP
ELECT. DEPT.
MAINTENANCE FACILITIES
POWER STA. 1
PUMP HOUSE
LOWER RING MILL
STORES ANNEX
DISPENSARY
HEAT TREATING NO. 1
RIGGERS
V.A.R. STORAGE
MACHINE SHOP NO. 2
STEEL PREP NO. 1
MELT SHOP
GARAGE
MET. BLDG.
BRICK SHOP
STORES & OFFICES
POWER STA. NO. 2
WALNUT STREET
OIL STORAGE
OIL
SUB STA 16
STEAM PLANT NO. 7
CLOSED OIE FORGE SHOP
OIL TANKS
BEECH STREET
BURNHAM
BOROUGH

ATTACHMENT 3

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: July 13, 2005 - 12:14 PM

Version: 2.0

User Selection Criteria

Location:	Pennsylvania	Evaluation Date Range:	10/01/1990 To 07/13/2005
Group of IDs:	Not Selected	Only Evaluations with Violations:	No
Handler Name:	STANDARD STEEL, LLC	Federal facilities only:	No
Handler ID:	PAD061106209	Reason Code:	All
Universe:	All	Display Code Descriptions:	Yes
Sort Order:	Region, State, Handler Name		

Results

Data meeting the criteria you selected follows.

Total Pages: 5 Handler Count: 1

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in the respective sections for evaluations and violations. Violation coverage areas are shown horizontally across the page in the evaluation data section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

Report Information

Name:	cmecomp.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed Date:	November 2002
Last Updated:	August 2004
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmecomp, cevaluation_area, hreport_univ, aarea, aln_area_event, aevent, gpra_ca, lu_state, hid_groups
Libraries:	cmedec2.pll

This report may contain enforcement sensitive data.

STANDARD STEEL LLC — **Activity Location:PA** — **PAD061106209**

Location: 500 N WALNUT ST
BURNHAM, PA 17009

Mailing: 500 N WALNUT ST
BURNHAM, PA 17009

County Name/Code: MIFFLIN/PA087 | State District: 3 | Accessibility: | Non-Notifier: | Extract Flag: Y

Universes

Generator: LQG
Transporter:

Full Enforcement: -----
Operating TSDF: -----
BOYSNC:
SNC:
Annual BOY Enf:

Subj CA:
Subj CA TSD 3004:
Subj CA TSD Discr:
Subj CA Non-TSD:
CA Wrkld:

Perm Prgrs: -----
Perm Wrkld: -----
Clos Wrkld: -----
Pclos Wrkld: -----

Op Pmt GPRA:
PClos GPRA:
CA GPRA:
CA HE EI:
CA GW EI:

CEI Evaluation 03/31/2004 Act Loc: PA By: State Seq #: 001 Person: MU Branch: WM Reason: Found Violation: N
Notes: Routine generator inspection

Coverage Areas: GEX GGR GLB GMR GOR GPT GRR

Violation Data	Enforcement Data
No Violations	No Enforcements

CEI Evaluation 02/05/2003 Act Loc: PA By: State Seq #: 001 Person: MU Branch: WM Reason: Found Violation: Y
Notes: Routine generator inspection

Coverage Areas: GEX GGR GLB GMR GOR GPT GRR

Violation Data								Enforcement Data								
Act Loc	C L	P R	Type	Res Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
PA			GRR	MU	WM	02/05/2003	03/05/2003		S0009	PA	02/05/2003	120	001		S	MU	WM			
Viol. Notes: PPC plan revisions not distributed																				

CEI Evaluation 02/11/2002 Act Loc: PA By: State Seq #: 001 Person: MU Branch: WM Reason: Found Violation: Y
Notes:

Coverage Areas: GEX GGR GLB GMR GOR GPT GRR

Violation Data								Enforcement Data								
Act Loc	C L	P R	Type	Res Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
PA			GRR	MU	WM	02/11/2002		02/11/2002	S0008	PA	02/11/2002	120	001		S	MU	WM			
Viol. Notes: Weekly inspection HW storage area.																				

CEI Evaluation 02/08/2001 Act Loc: PA By: State Seq #: 001 Person: MU Branch: WM Reason: Found Violation: N
Notes: Routine generator inspection.

Coverage Areas: GEX GGR GLB GMR GOR GPT GRR

Violation Data	Enforcement Data
No Violations	No Enforcements

This report may contain enforcement sensitive data.

STANDARD STEEL LLC, PAD061106209, BURNHAM, PA, continued -

CEI Evaluation 03/08/1995 Act Loc: PA By: State Seq #: 000 Person: JDS Branch: Reason: Found Violation: N
Notes:

Coverage Areas: GEX GGR GLB GMR GOR GPT GRR GSC

Violation Data	Enforcement Data
No Violations	No Enforcements

CEI Evaluation 02/03/1994 Act Loc: PA By: State Seq #: 000 Person: JDS Branch: Reason: Found Violation: Y
Notes:

Coverage Areas: GEX GGR GLB GMR GOR GPT GRR GSQ

Violation Data								Enforcement Data								
Act Loc	C L	P R	Type	Res Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
PA	2		GPT	JDS		02/03/1994	02/03/1994	02/03/1994	S0007	PA	02/03/1994	110	000		S	JDS				
Viol. Notes: 1 DRUM OPEN IN STORAGE CLOSED DURING INSPECTION																				

CEI Evaluation 03/30/1993 Act Loc: PA By: State Seq #: 000 Person: JS Branch: Reason: Found Violation:
Notes:

Coverage Areas: GEX GGR GLB GMR GOR GPT GRR GSC

Violation Data	Enforcement Data
No Violations	No Enforcements

CEI Evaluation 12/11/1991 Act Loc: PA By: State Seq #: 000 Person: R3JDS Branch: Reason: Found Violation:
Notes: TCLP

Coverage Areas: GGR GLB GMR GOR GPT GRR

Violation Data	Enforcement Data
No Violations	No Enforcements

Total Number of Handlers: 1

Total Number of Activity Locations: 1

*** End of Report ***

This report may contain enforcement sensitive data.

Description of codes used on the report:

Universes	Description Of Universes
Operating tsdf	Indicates that the facility is a treatment, storage or land disposal facility subject to any type of enforcement. Then specifies type facility (see LIBST below for further explanation).
PCWrkId	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Post-Closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
ClosWrkId	Indicates that the facility is a treatment, storage or land disposal facility which is part of the closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
Perm/PC	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permitting/Closure/Post-Closure Progress universe. It is then specifies type of facility (see LIBST below for further explanation).
PermWrkId	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permit Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
SubjCA	Indicates that the facility is subject to Corrective Action. ('X' indicates that the facility is in this universe).
CAWrkId	Indicates that the facility is part of the Corrective Action Workload universe. ('X' indicates that the facility is in this universe).
LQG	Indicates that the facility is a Large Quantity Generator. ('X' indicates that the facility is in this universe).
SQG	Indicates that the facility is a Small Quantity Generator. ('X' indicates that the facility is in this universe).
CESQG	Indicates that the facility is a Conditionally Exempt Small Quantity Generator. ('X' indicates that the facility is in this universe). Note: CESQG are not nationally required to notify or obtain an EPA ID. Therefore, the absence of CESQG data for any given state or facility does not indicate a data quality problem.
Transporter	Indicates that the facility transports waste subject to RCRA regulations. ('X' indicates that the facility is in this universe).
SNC	Indicates that the facility is a Significant Non-Complier. ('X' indicates that the facility is in this universe).
BOYSNC	Indicates that the facility was a Significant Non-Complier at the beginning of the fiscal year: Oct 1- Sep 30. ('X' indicates that the facility is in this universe).

LIBST in the above universes indicates:

- **L** Land Disposal facility
- **I** Facility is an Incinerator
- **B** Facility is a Boiler or Industrial Furnace (BIF)
- **S** Storage facility
- **T** Treatment facility

This report may contain enforcement sensitive data.

Description of codes used on the report:

ACT LOC
Act Loc indicates the activity location where the evaluation/inspection was performed, the violation was discovered or the enforcement action was taken.

Agency indicates the agency performing the evaluation or the enforcement action:	
X-EPA	EPA region performed the evaluation or enforcement action as part of their oversight function.
C-EPA	Contractor working for EPA conducted the evaluation.
B-State	Contractor working for State conducted the evaluation.
EPA	EPA performed the evaluation or enforcement action.
State	State performed the evaluation or enforcement action.

BY
By indicates the agency who performed the evaluation/inspection.

FOUND VIOLATION indicated whether or not the evaluation discovered a violation.
It will contain the following values:

Code	Description
Y	indicates that the evaluation did find violations.
N	indicates that the evaluation did not find violations.
U	indicates that it is undetermined at this time. The agency may still be determining whether violations existed.
blank	converted from the previous system which did not have a definitive answer to whether nor not violations were found.

Coverage Area/Violation Type	Description
GPT	GENERATOR-PRE-TRANSPORT REQUIREMENTS
GRR	GENERATOR-RECORDKEEPING REQUIREMENTS

Enforcement Type	Enforcement Description
110	VERBAL INFORMAL
120	WRITTEN INFORMAL

ATTACHMENT 4

2004
Vacation Shutdown
Skimmer Pit Sludge

368.57 Tons

American Landfill Inc.
7916 Chapel Street, SE
Waynesburg, OH. 44688

2004
Filter Cake

80,240 Pounds

Allied / BFI Carbon Limestone
8100 Stateline Road
Lowellville, OH. 44436

2004
Oil & Grease Debris

54,760 Pounds

Allied / BFI Carbon Limestone
8100 S. Stateline Road
Lowellville, OH. 44436

2004
Oily Wastewater

64,501 Gallons

Environmental Recovery Corporation
1076 Old Manheim Pike
Lancaster, PA. 17601

2004
Waste Oil

40,787 Gallons

Environmental Recovery Corporation
1076 Old Manheim Pike
Lancaster, PA. 17601

2004
Torch Cut-Off Fume

44,160 Pounds

Standard Steel
Slag Site

1.3.2 Hazardous Waste Inventory

Standard Steel generates several hazardous waste streams at the Burnham Plant which are handled and disposed or reclaimed at off-site, permitted hazardous waste treatment, storage, or disposal facilities (TSDF) in accordance with applicable hazardous waste regulations. These hazardous waste streams include EAF dust, spent degreasing solvents, and spent etching acid.

EAF Dust

During normal operations, the Melt Shop generates approximately 5 to 8 tons per day of EAF baghouse dust which is captured in the EAF dust baghouse. The EAF dust is pelletized by Standard Steel personnel, then placed into a transport container. In its pelletized form, Standard Steel's EAF dust exhibits a bulk density of approximately 85 pounds per cubic foot. Production activities generate about 4 to 7 cubic yards of EAF dust per day and 2 to 3 EAF dust loads per week that are transported to an off-site TSDF. The EAF baghouse dust has been classified as a listed hazardous waste by the U.S. Environmental Protection Agency (USEPA) due to the potential for leaching of lead, cadmium, and chromium contained in the EAF dust. It is shipped off-site using hazardous waste manifests under hazardous waste code K061.

Spent Degreasing Solvents

As previously discussed, Safety Kleen maintains several parts-cleaning stations that generate spent degreasing solvents primarily comprised of mineral spirits. When degreasing solvent contained in a parts-cleaning station is no longer usable, it is reclaimed and recycled by a vendor such as Safety Kleen or Marisol. Standard Steel has determined that, if hazardous, these spent degreasing solvents are an ignitable, characteristic hazardous waste (hazardous waste code D001) due to their low flash points.

Standard Steel also generates petroleum naphtha degreaser waste. This hazardous waste is accumulated in approved 55-gallon drums and

steel parts-cleaning containers and picked up by Safety Kleen or Marisol for subsequent recycling and/or disposal. Standard Steel has determined that, if hazardous, spent petroleum naphtha degreaser is an ignitable, characteristic hazardous waste (hazardous waste code D001) due to its low flash point. These liquid hazardous wastes are kept in accumulation areas that meet applicable hazardous waste management regulations. Accumulation areas are shown on Figure 4.

Spent Etching Acid

Standard Steel's Test Preparation Center utilizes etching acid to prepare metal test blanks for metallurgical analyses in support of metallurgical laboratory operations. The Test Preparation Center is located in Heat Treating No. 1 Building, as shown on Figure 4. Etching operations are conducted on an as-needed, batch basis and the Test Preparation Center may be inactive for periods of time.

Test blanks are cut to size and delivered to the Test Preparation Center in Heat Treating No. 1 Building, where they are prepared by exposing them to various acids at slightly elevated temperatures. The test blanks are placed in racks, which are then lowered into a tank containing an acid bath comprised of hydrochloric or nitric acid. The acid bath is heated to the required temperature and the test blanks are exposed to the acid bath for a specified period of time. Upon completion of acid etching, the rack and test blanks are moved to an adjacent rinse tank and rinsed. Rinse water is used as make-up water to reduce the amount of spent acid and rinse water generated. When the acid bath is exhausted or rinse water must be changed out, the resulting fluids are accumulated in the spent etching acid tank. This polyethylene tank has an approximate capacity of 1,200 gallons. The accumulated fluid is periodically removed by a tanker and transported via hazardous waste manifest to a permitted TSDF. Standard Steel has determined that spent etching acid is a corrosive, characteristic hazardous waste (hazardous waste code D002) due to its aqueous nature and low pH.

1.3.3 Residual Waste Inventory

Residual wastes generated and stored at the Burnham Plant are comprised of both solid and liquid waste streams. In order to identify residual waste streams that are currently generated at the Burnham Plant and to evaluate potential spill concerns associated with those wastes, Standard Steel reviewed current plant processes, material handling practices, and available waste characterization data. Based on this review, there are three categories of solid residual waste streams that are generated at the Burnham Plant. The first solid residual waste category is major waste streams that account for the majority of residual waste generated on both a weight and volume basis. These include slag and spent furnace/ladle refractories, which are transported by plant personnel to Standard Steel's captive residual waste landfill.

The second category is minor waste streams that are frequently disposed but do not constitute a significant percentage of the total residual waste at the plant; these residual wastes include torch cut-off fume, spent grinding and cut-off wheels, demolition waste generated at the plant, popcorn slag, foundry sand, and spent absorbent material.

The third category is comprised of coproducts that are typically collected at their generation points and processed in order to reclaim their considerable metals values. Small amounts of these coproducts, which are mill scale, shot-blast dust, and spent carbon electrodes, may be disposed during plant maintenance activities or as a result of upsets in the collection/reclamation processes. In addition to solid residual waste streams, Standard Steel generates one liquid residual waste stream which is waste oil.

Standard Steel exercises considerable care to segregate and properly manage waste streams generated at the Burnham Plant that are not suitable for disposal as residual waste at its residual waste landfill (e.g., hazardous wastes such as EAF dust and liquid wastes

such as waste oil). Residual waste streams generated at the Burnham Plant are listed below.

- Slag
- Spent furnace and ladle refractories
- Torch cut-off fume
- Grinding and cut-off wheels
- Demolition wastes consisting of concrete, brick, uncontaminated foundation soils, and related materials generated at the plant
- Popcorn slag
- Foundry sand
- Mill scale
- Shot-blast dust
- Spent carbon electrodes
- Spent absorbent material
- Waste oils
- Wastewater treatment solids

Each of these residual waste streams is discussed in the following sections and copies of waste characterization data and/or applicable MSDSs are maintained in Plant Engineering.

Slag

Slag (residual waste code #102) is a residual waste that is generated during operation of several EAFs. The EAFs operate at elevated temperatures in order to melt charged metal and other constituents. A molten layer of metal oxides, impurities, and other constituents forms above the molten metal. This molten layer is tapped or drained from the EAF and forms slag when it cools. The slag is collected at a central location within the Melt Shop, loaded onto trucks, and hauled to the Burnham Plant's captive residual waste landfill by Transportation Department personnel. The Burnham Plant generates approximately 12,000 tons of slag per year; amounts on site may vary from <1 ton to as much as 100 tons.

Spent Furnace and Ladle Refractories

Spent furnace and ladle refractories (residual waste code #103) are wastes that are generated within the Burnham Plant during the

breakout, maintenance, and renovation of furnaces including EAFs, reheating and heat-treating furnaces, ladles, and molds. The major constituents of these wastes are spent refractory materials of various shapes, sizes, and compositions. Minor constituents include mold coating compounds, hot topping compound, vermiculite, and remnant metal. Spent refractory wastes are collected at several central locations within the Melt Shop, loaded onto trucks, and hauled to the Burnham Plant's captive residual waste landfill by Transportation Department personnel. Remnant metal is separated by the residual waste landfill's on-site contractor for recycling and/or reclamation and the remaining wastes are disposed. The Burnham Plant generates approximately 4,000 tons of spent refractory waste per year; amounts on site may vary from less than one ton to as much as 40 tons.

Torch Cut-off Fume

Torch cut-off fume (residual waste code #105) is a residual waste that is generated at the Burnham Plant at several locations by high-temperature gas cutting of steel and steel alloy ingots. The dust, or fume, that is generated during torch cutting operations is collected in baghouses and placed in a centrally-located roll-off container that is periodically hauled to the residual waste landfill for disposal. Because the metal-cutting operations are conducted at elevated temperatures in an oxygenated atmosphere, the fume is comprised primarily of metal oxides. The Burnham Plant generates approximately 200 tons of torch cut-off fume per year; amounts on site may vary from <1 ton to as much as 20 tons.

Grinding and Cut-off Wheels

Grinding and cut-off wheels (residual waste code #104) are industrial products that are purchased by Standard Steel and used to grind and cut ingots and other metal shapes. During the grinding and cut-off processes, the abrasive wheels remove metal which is accumulated in containers and baghouses as reclaimable swarf and dust. The wheels are worn down by contact with the metals and are

discarded when they reach a specified minimum size. The spent wheels are collected by plant personnel and routed to the residual waste landfill for disposal. The Burnham Plant generates approximately 5 tons of spent grinding and cut-off wheels per year; amounts on site may vary from none present to as much as 1 ton.

Demolition Wastes

Standard Steel periodically renovates existing portions of the Burnham Plant as part of modifications and upgrades to their industrial processes. Small quantities of demolition wastes are generated during construction activities related to such renovations. The demolition wastes consist of concrete, stone, brickwork, soils adjoining foundation structures, and smaller amounts of related materials. Although these materials generally meet DEP clean fill criteria, they are typically accumulated at the construction site, loaded into trucks, and transported off site for disposal as construction and demolition waste. The Burnham Plant generates approximately 200 tons of demolition waste per year; amounts on site may vary from none present to as much as 50 tons.

Popcorn Slag

Popcorn slag (residual waste code #102) is a low-density slag that Standard Steel infrequently obtains in small quantities for use as a special bedding material. This slag is generated off site in a high-temperature process that is similar to that described above for the Burnham Plant's slag. Because of its favorable thermal insulating properties, it is used as a bedding and cover material in the controlled, slow-rate cooling of certain steel alloy ingots. The popcorn slag contacts the hot ingots but remains chemically inert. However, over time, the popcorn slag is physically degraded and loses some of its thermal properties. When this occurs, the spent popcorn slag is replaced and disposed. The Burnham Plant generates approximately 10 tons of spent popcorn slag per year; amounts on site may vary from none present to as much as 10 tons.

Foundry Sand

Foundry sand (residual waste code #101) is a well-sorted fine sand that is purchased by Standard Steel and used in small amounts in the makeup of ingot molds. It fills spaces between refractory bricks and other portions of the molds and is used once prior to disposal. During the process, foundry sand is exposed to elevated temperatures and may be exposed to mold coating compounds and molten metal. The spent foundry sand (residual waste code #101) is collected along with other spent refractory wastes during mold breakout and hauled to the Burnham Plant's captive residual waste landfill by Transportation Department personnel for disposal. The Burnham Plant generates approximately 200 tons of spent foundry sand per year; amounts on site may vary from less than one ton to as much as 20 tons.

Mill Scale

Mill scale is a metal oxide coating that forms on ingots, blooms, and other metal shapes as a result of exposure to high temperatures in an oxygenated atmosphere. At the Burnham Plant, mill scale is primarily generated at four locations including the ring mill, open die forge shop, axle forging mill, and closed die forge shop. As the heated metal cools, a brittle coating of mill scale forms on the outside of the metal. As that metal is manipulated, the mill scale breaks away from the metal. Plant personnel accumulate the mill scale and transport it to the residual waste landfill for further processing by the on-site contractor and reuse it. Most mill scale is reclaimed as a coproduct; however, small amounts of mill scale (residual waste code #104) may be disposed if commingled with plant residual wastes. The Burnham Plant disposes of approximately 70 tons of mill scale per year; amounts on site may vary from less than one ton to as much as 10 tons.

Shot-Blast Dust

Shot-blast dust is generated at two locations in the Burnham Plant. Shot-blasting devices propel steel shot against metalwork to remove

thin coatings of mill scale and other high-temperature residues. The steel shot and dust generated during the process are collected and separated in a cyclonic separator. The steel shot is reused until it reaches a certain minimum size, at which time it is no longer useful for shot-blasting. Shot-blast dust and spent steel shot are typically further processed to reclaim their metals content. Small amounts of shot-blast dust (residual waste code #105) that are swept from the shop floor or are otherwise unsuitable for reclamation may be commingled with other residual wastes and disposed at Standard Steel's residual waste landfill. The Burnham Plant disposes of approximately 90 tons of shot-blast dust per year; amounts on site may vary from <1 ton to 10 tons.

Carbon Electrodes

Standard Steel purchases carbon electrodes for use in the Burnham Plant's EAFs. After their initial use, most carbon electrodes are returned as a coproduct to vendors. These electrodes transmit electrical energy from the plant's electrical power system to metals and other constituents that have been charged into the EAFs, resulting in elevated temperatures within the EAF that melts the charge. The carbon electrodes are primarily comprised of dense graphite and are normally consumed during the melting process. Spent, damaged, or broken electrodes are normally returned to the vendor for recycling or reclamation as a coproduct. Small fragments of electrodes damaged during use or EAF maintenance may be disposed (residual waste code #103) at the residual waste landfill. The Burnham Plant disposes of approximately 1 ton of spent carbon electrodes per year; amounts on site are less than 1 ton.

Spent Absorbent Material

Standard Steel uses absorbent materials such as floor-dry compounds, absorbent blankets, and cloth rags to control and clean up spills of petroleum products throughout the Burnham Plant. Spent absorbent material and solid petroleum wastes such as lubricants (residual waste code #503) are placed in collection containers and

transported to a covered roll-off container that is dedicated for such wastes. This roll-off container is periodically transported to an off-site, permitted solid waste disposal facility for disposal. The Burnham Plant generates approximately 60 tons of spent absorbent material per year; amounts on site may vary from less than one ton to as much as 20 tons.

Waste Oil (Revised 2/5/04)

Waste oil (residual waste code #509) is a liquid residual waste that is generated by routine maintenance of equipment and cleaning of collection sumps associated with hydraulic forging equipment. Waste oil is collected in the plant in portable 500-gallon tanks and 55-gallon steel drums prior to disposal. Waste oil generated in the plant may also be collected and transported in one of two rail tank cars (approximate capacity 11,000 gallons each) or in a truck tanker with an approximate capacity of 6,000 gallons. Collected waste oil is stored in two 6,000-gallon tanks in the AFM building's north end pending off-site recycling or disposal.

Waste oil and oily water are also removed from the plant's skimmer pits by rope skimmers and temporarily stored in four tanks with approximate capacities of 1,500 gallons each. These tanks are part of the Burnham Plant's NPDES-permitted wastewater treatment system and are not required to be registered. Plant laborers periodically remove waste oil and oily water from these tanks and transport the wastes to the 6,000 gallon storage tanks in the AFM building.

Wastewater Treatment Solids

Standard Steel operates wastewater treatment equipment such as oil/water separator skimmer pits and dispersed air flotation (DAF) units. This equipment is intended to remove potential pollutants such as oil, grease, and solids from wastewater prior to its discharge into Kishacoquillas Creek. Skimmer pit wastewater treatment operations include primary settling of solids and floating oil removal by tubular skimmers, resulting in generation of

skimmer pit sludge and waste oil. DAF units are utilized at 2 of the oil/water separators to further remove solids from plant wastewater. Treatment activities at the DAF units include addition of chemicals such as lime and a flocculating polymer and removal of solids by a traveling plate filter press. Solids generated by these wastewater treatment activities are referred to as skimmer pit sludge or filter cake (residual waste code #203). Skimmer pit sludge is typically removed on an annual basis during scheduled summer maintenance shutdowns. Filter cake is regularly removed from the filter press and placed in a roll-off container that is dedicated for this waste stream. This roll-off container is periodically transported to an off-site, permitted solid waste disposal facility for disposal. The Burnham Plant generates approximately 500 tons of wastewater treatment solids per year; amounts on site may vary from 10 tons to as much as 200 tons.

ATTACHMENT 5

Standard Steel
CEI May 24, 2005
Photographic Log

1. "Torch Cut" dust collectors
2. Rolloff storage for Torch Cut dust waste
3. Common baghouse for all K061 waste streams
4. K061 waste storage area (sign on outside of bldg reads: "Hazardous Waste Storage Electric Arc Furnace Dust K061")
5. K061 dust collection bin (significant dust on ground in this area)
6. Trailer holding K061 waste (labeled "Residual Waste")
7. View into bed of K061 trailer from Photo #6 (open, about 1/2 full)
8. Additional label on Photo #6 trailer reads: "Controlled Hazardous Substances Hauler," "Maryland Department of the Environment"
9. Additional sign on trailer from Photo #6 reads: "Pennsylvania Department of Environmental Protection, Waste Transportation Authorization, Municipal/Residual Waste Transporter"
10, 11. Shots of K061 dust on floor of collection bin room shown in Photo #5
12, 13. Second trailer containing K061 waste – full, closed, not labeled as hazardous or K061
14. Sump behind trailer shown in Photo #6 – full of liquid.
15. Mill scale covering floor of Closed Die Forge Shop (Wheel Mill)
16-18. Wheel forging process
19. Rolloff containing sludge from Dissolved Air Flotation (DAF) unit
20. Filter press for DAF unit
21. Collection bins beneath DAF unit (both practically full)
22. Outdoor residual waste storage area, right side (refractory shown at left, shot blast on right)
23. Left side of outdoor storage area shown in Photo #22 (ballast front left, refractory in the rear)
24. Shot blast machines
25. 55 gal drum of used parts washer (not managed by Safety-Kleen)
26. Non-Safety-Kleen parts washer
27. Open, unlabeled bucket which collects waste from Photo #26 parts washer (~1" of liquid present)
28, 29. Four open, unlabeled boxes of used bulbs in Maintenance area
30. Used oil storage area
31-33. Four open 55 gal drums of unknown oily substance
34. Location of four drums shown in Photos #31-33 in relation to used oil storage tanks
35, 36. Views inside oily debris trailer found in "Forge Shop" section of Axle Building
37. Outside of oily debris trailer shown in Photos #35-36
38. Mill scale pit for axles
39. Axle mill scale pile
40. Four used batteries stored on pallet near maintenance garage, not labeled
41. Etching tanks in Metallurgic Lab Annex
42. Waste acid tank in Met. Lab Annex

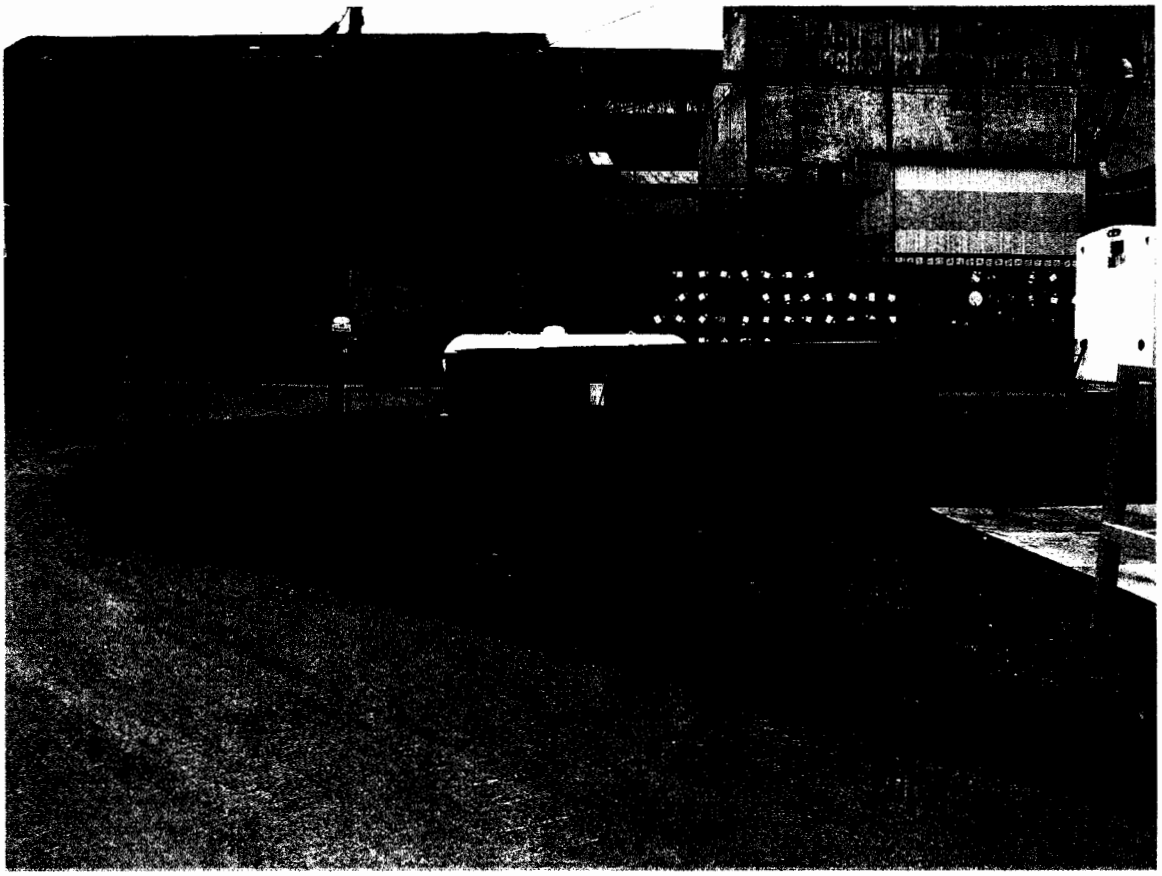
43. Close-up of label on waste acid tank shown in Photo #42 – "Waste Corosive Liquid Acid Etching Liquid," dated 1/31/05.

Standard Steel
Burnham, PA
PAD061106209 PHOTO 1

"Torch Cut" dust collectors

Standard Steel
Burnham, PA
PAD061106209

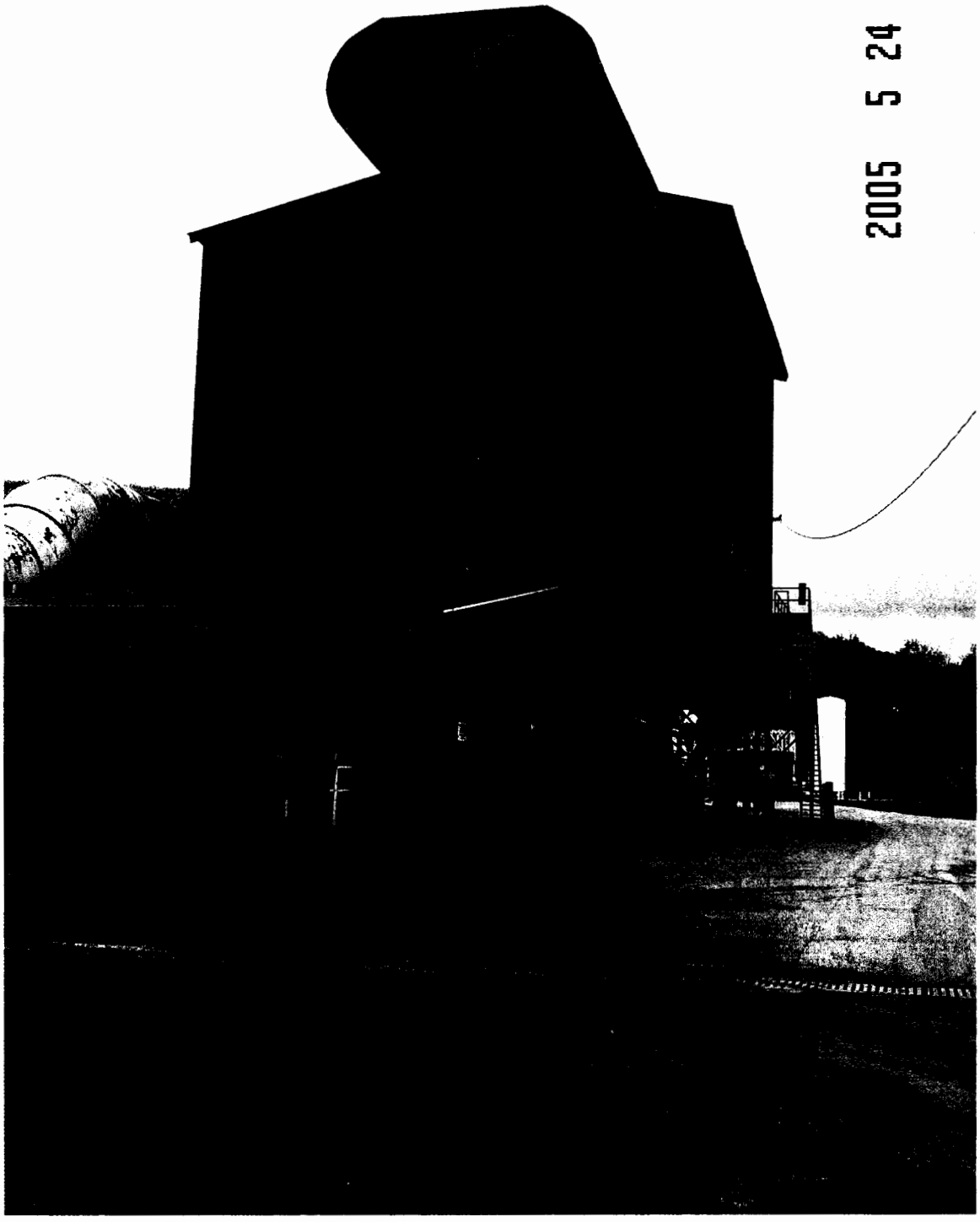
PHOTO 2



Roll-off storage for Torch Cut dust waste

Standard Steel
Burnham, PA
PAD061106209

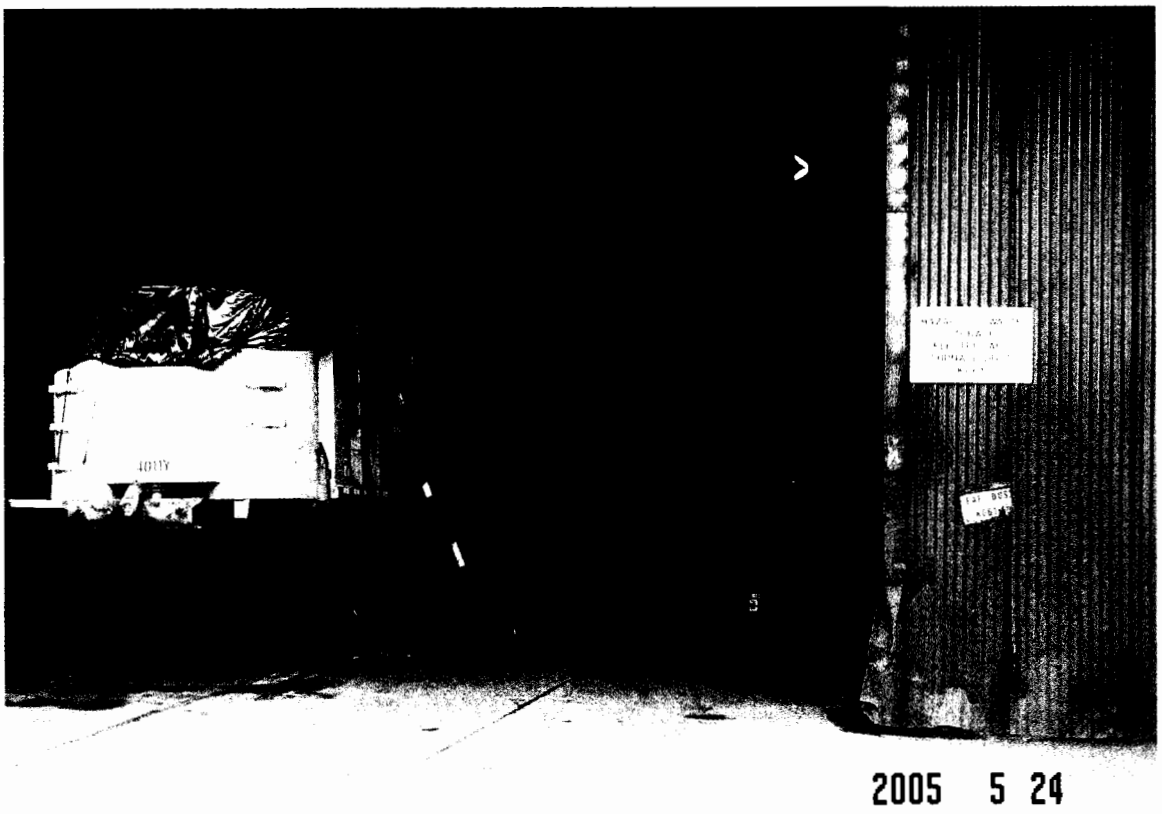
PHOTO 3



Common baghouse for all K061 EAF dust
Trailer that is full of K061 dust, but not labeled, is in the background

Standard Steel
Burnham, PA
PAD061106209

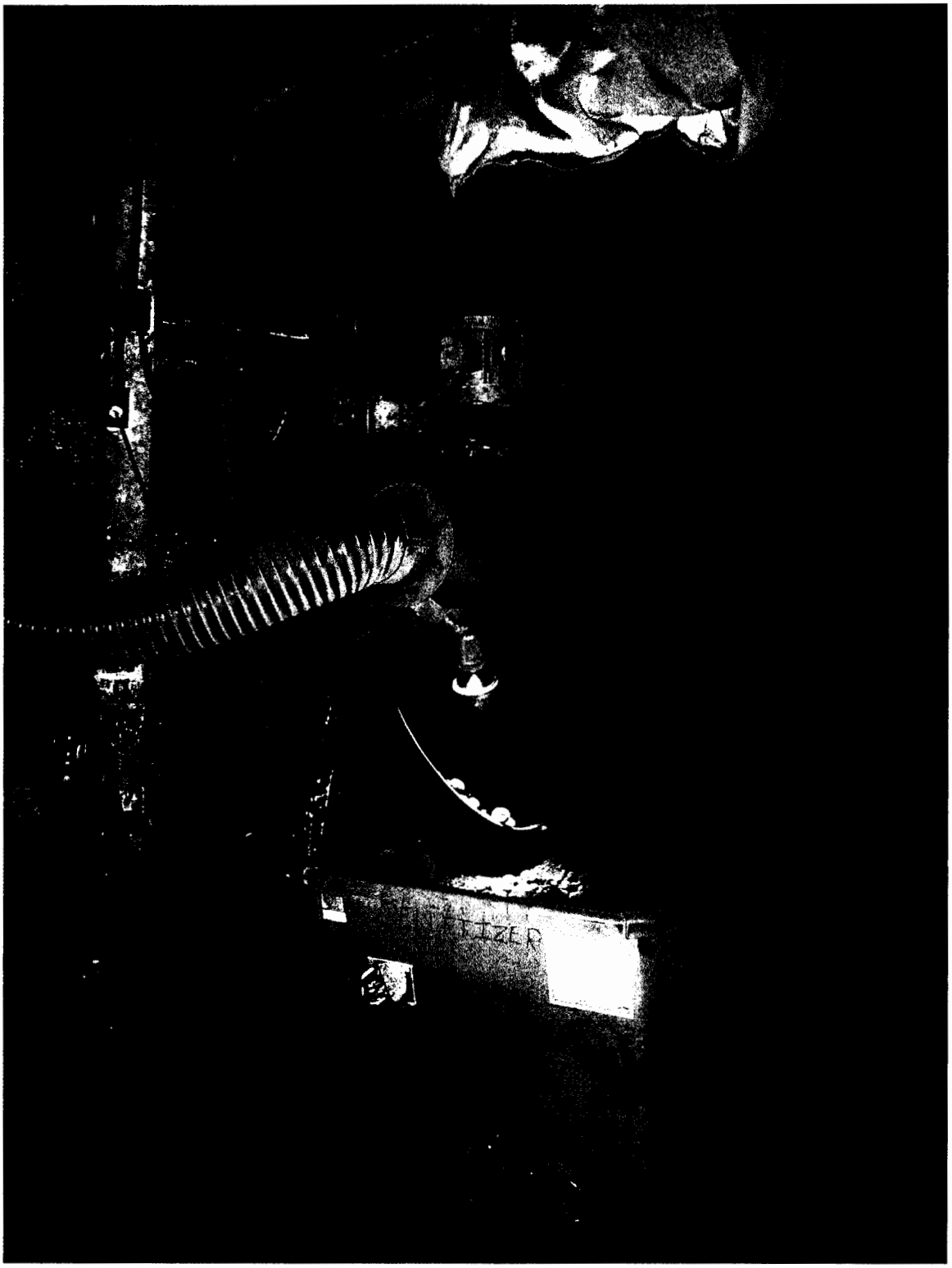
PHOTO 4



Current trailer being loaded with K061 dust, trailer not labeled or covered
Sign on building reads: "Hazardous Waste Storage Electric Arc Furnace Dust K061"

Standard Steel
Burnham, PA
PAD061106209

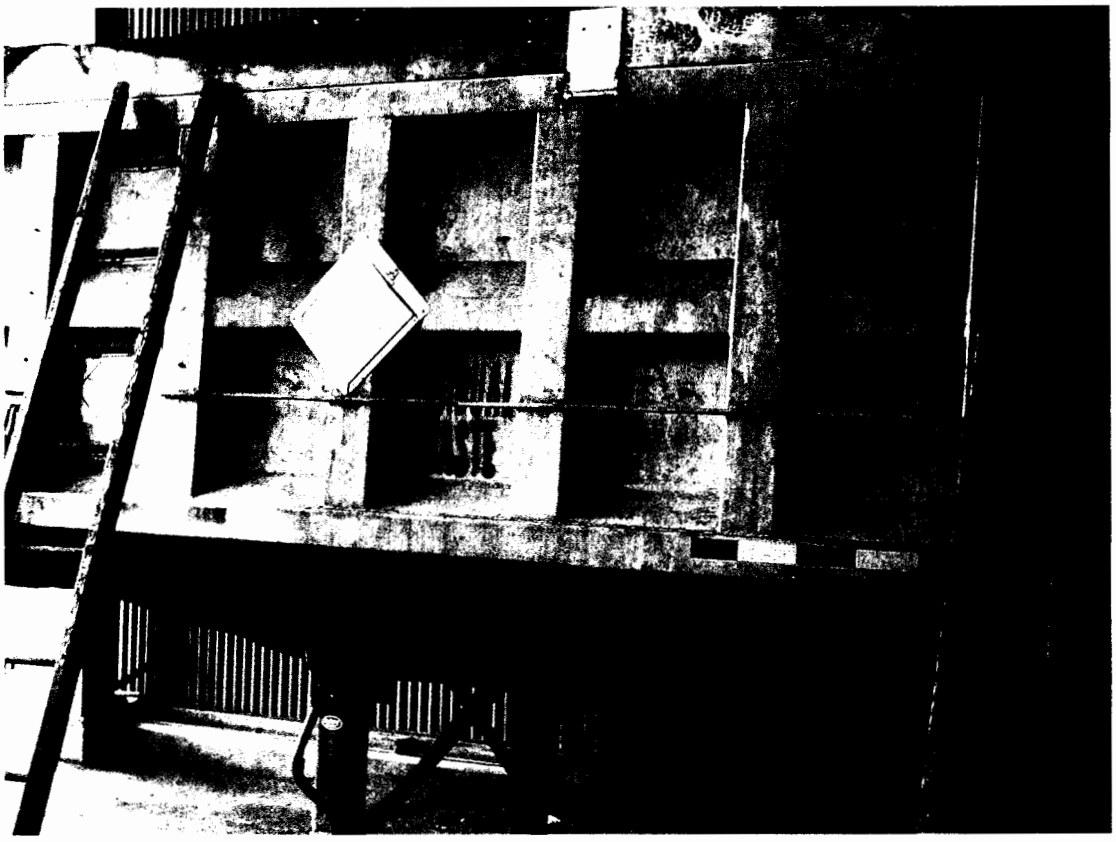
PHOTO 5



K061 dust collection bin (some dust on ground in this area)

Standard Steel
Burnham, PA
PAD061106209

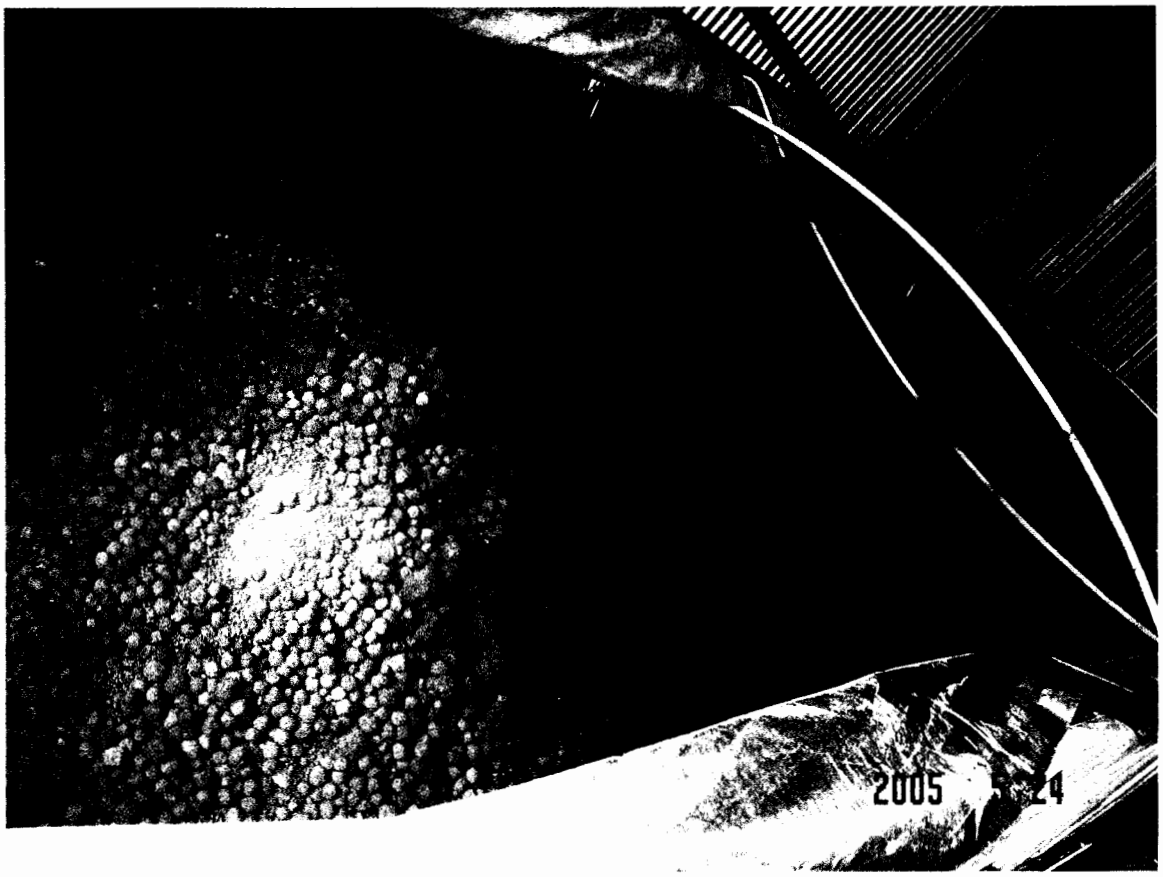
PHOTO 6



Trailer in loading area holding K061 waste (note: RESIDUAL WASTE label)

Standard Steel
Burnham, PA
PAD061106209

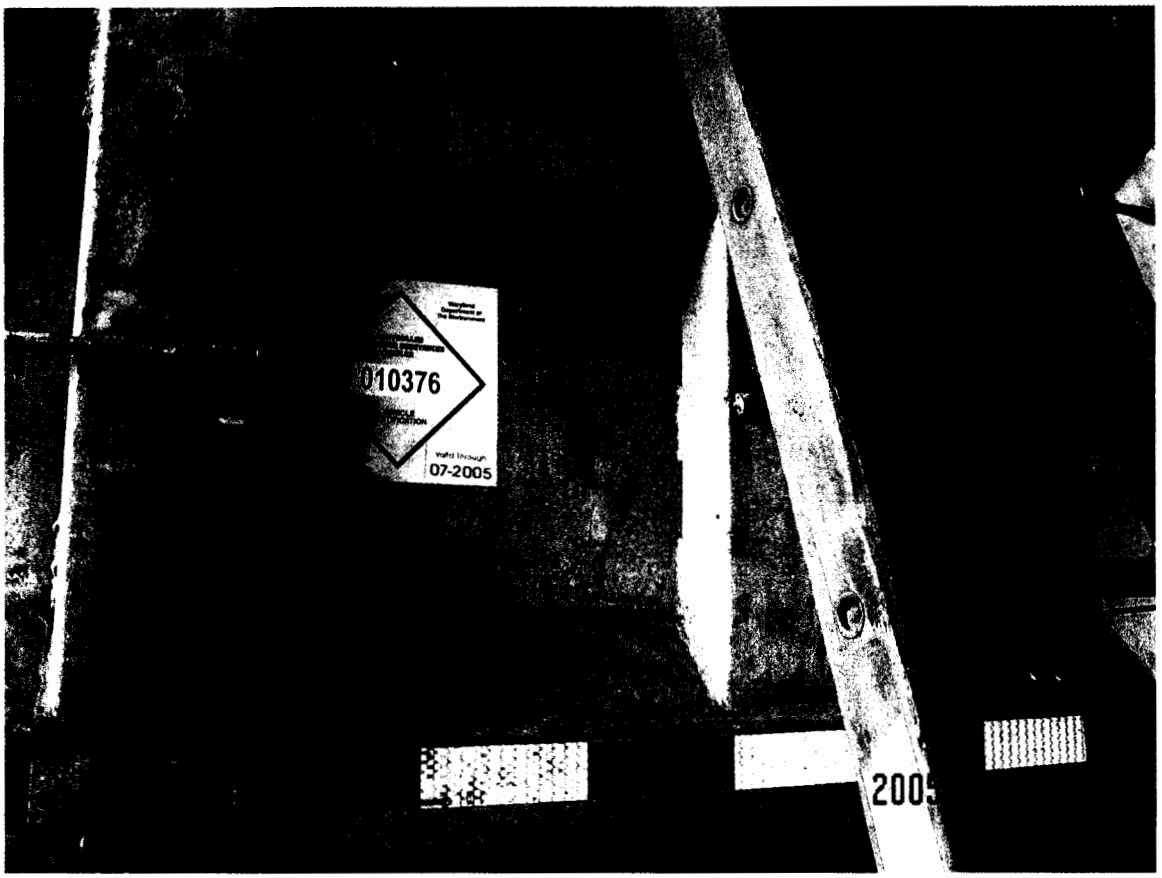
PHOTO 7



View into bed of K061 trailer from PHOTO 6 (uncovered, about ½ full)

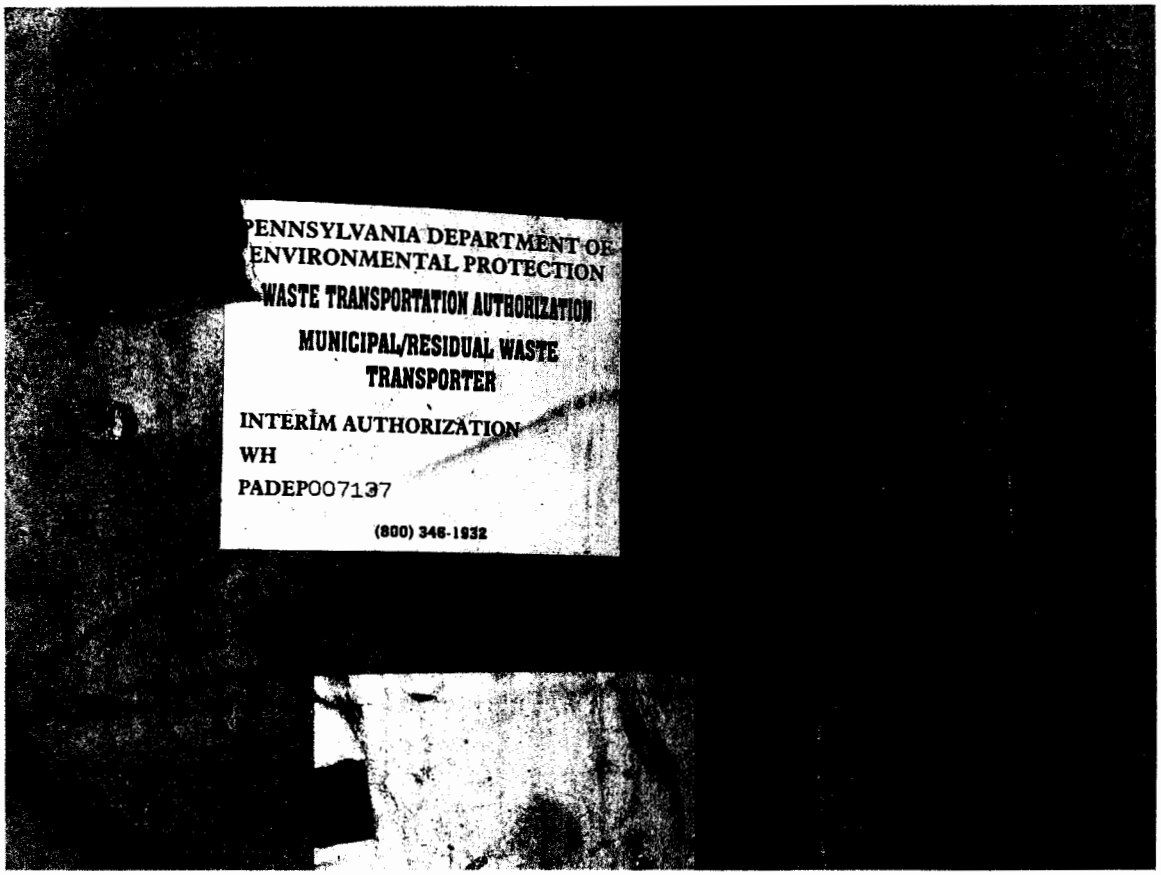
Standard Steel
Burnham, PA
PAD061106209

PHOTO 8



Additional label on trailer from PHOTO 6 reads:
"Controlled Hazardous Substances Hauler"
"Maryland Department of the Environment"

Standard Steel
Burnham, PA
PAD061106209 PHOTO 9

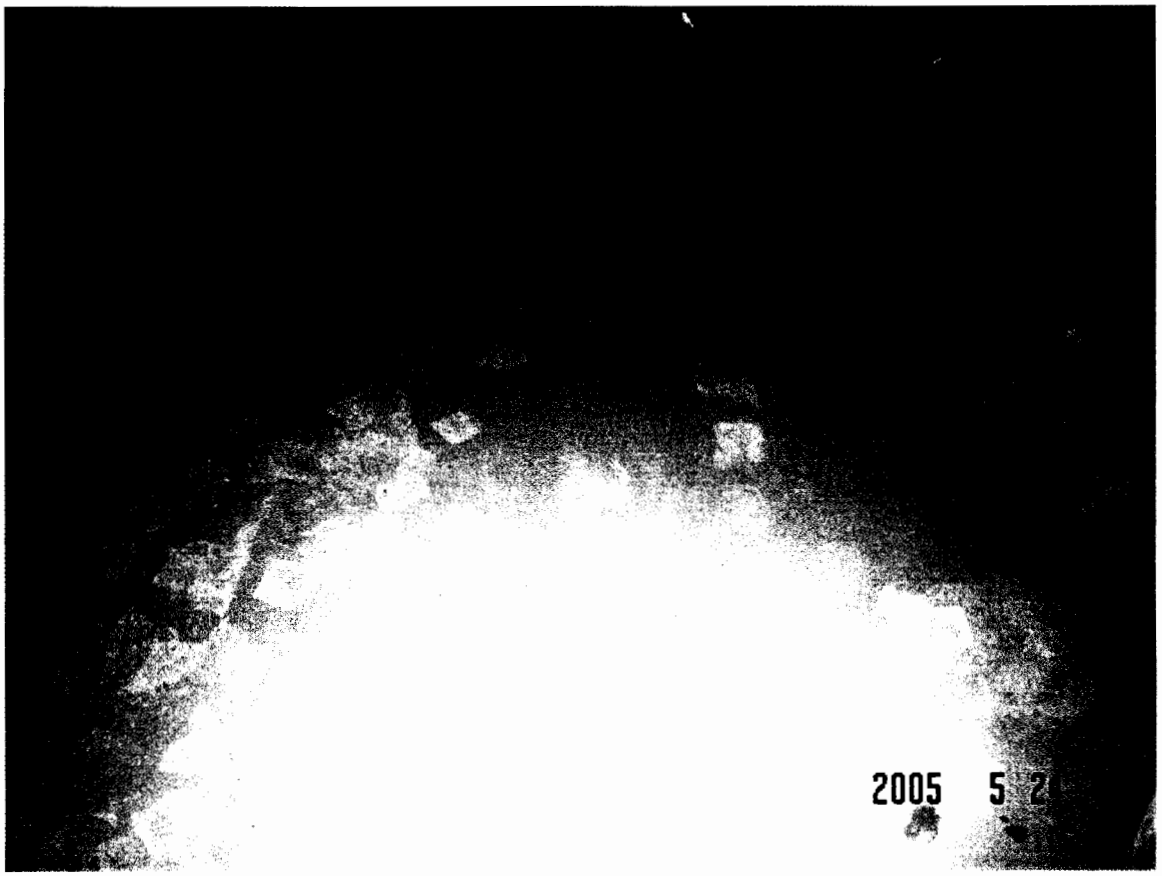


Additional sign on trailer from PHOTO 6 reads:
"Pennsylvania Department of Environmental Protection, Waste Transportation Authorization, Municipal/Residual Waste Transporter"

Standard Steel
Burnham, PA
PAD061106209 PHOTO 10

K061 dust on floor of collection bin room from PHOTO 5

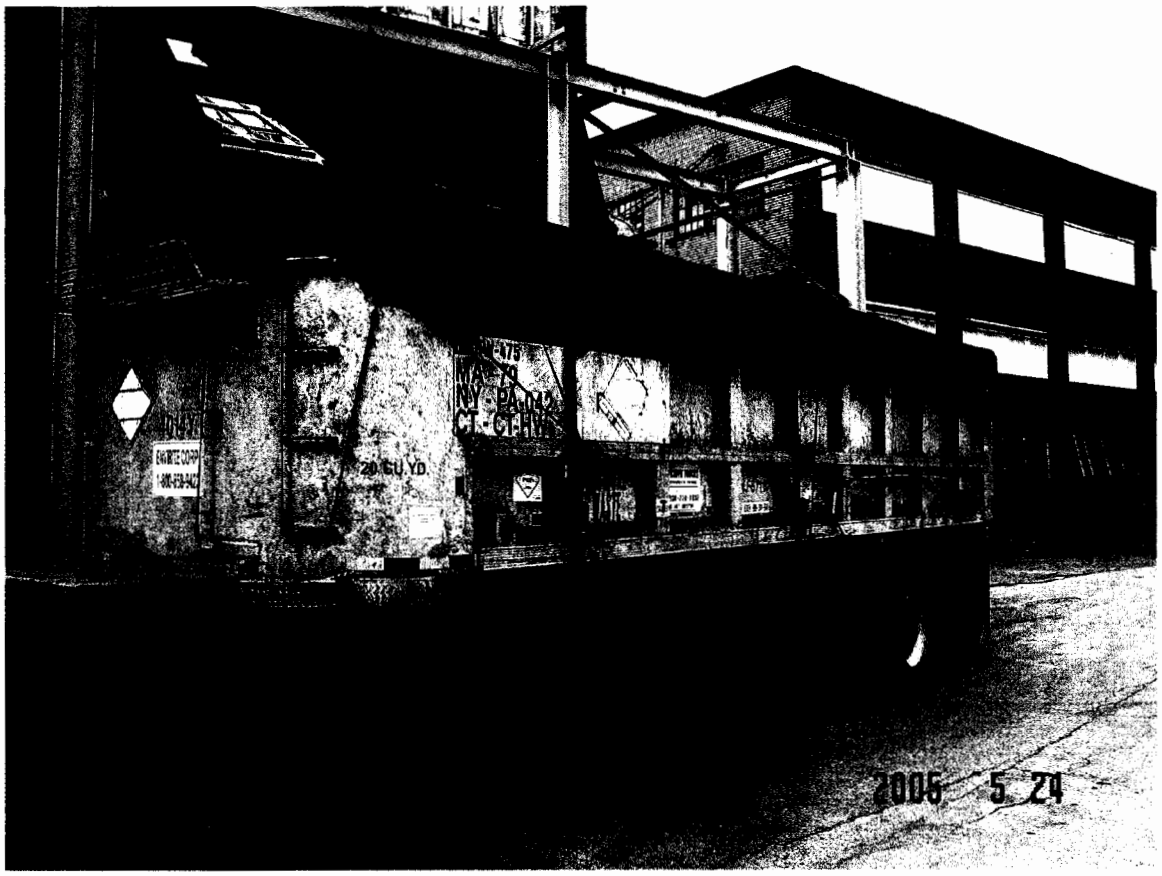
Standard Steel
Burnham, PA
PAD061106209 PHOTO 11



K061 dust on floor of collection bin room shown in PHOTO 5

Standard Steel
Burnham, PA
PAD061106209

PHOTO 12



Full trailer of K061 dust parked outside of building
Trailer is covered, not labeled as Hazardous Waste or as K061

Standard Steel
Burnham, PA
PAD061106209 PHOTO 13

Full trailer of K061 dust parked outside of building
Trailer is covered, not labeled as Hazardous Waste or as K061

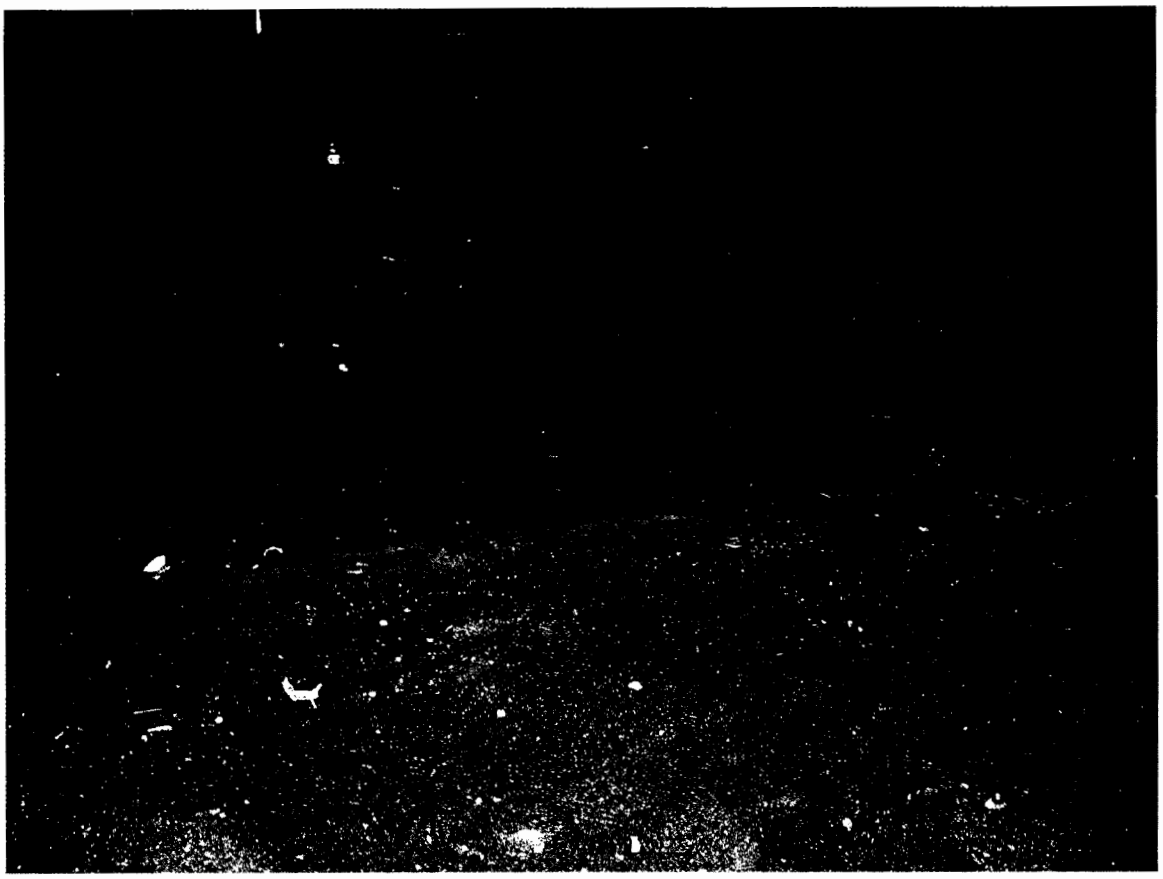
Standard Steel
Burnham, PA
PAD061106209

PHOTO 14

Sump behind open trailer being loaded with K061 dust inside building
The sump is full of liquid

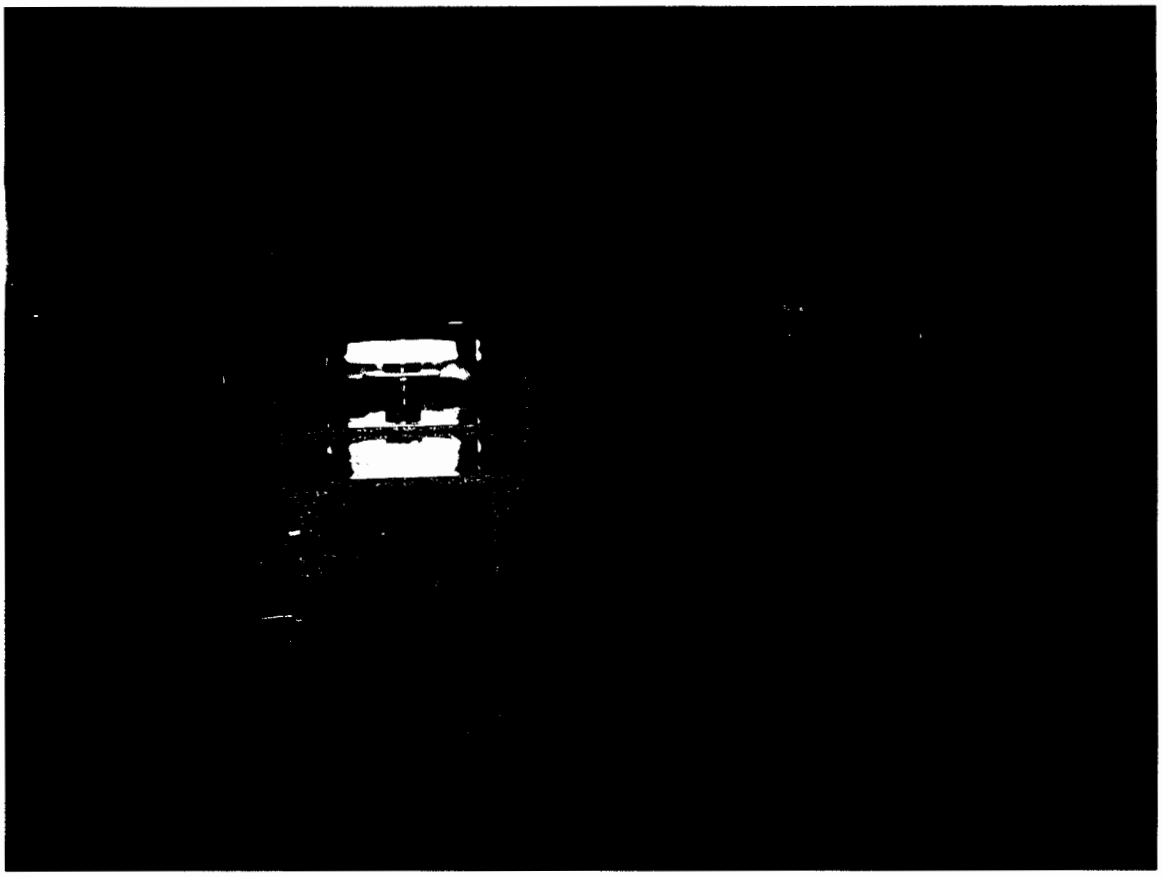
Standard Steel
Burnham, PA
PAD061106209

PHOTO 15



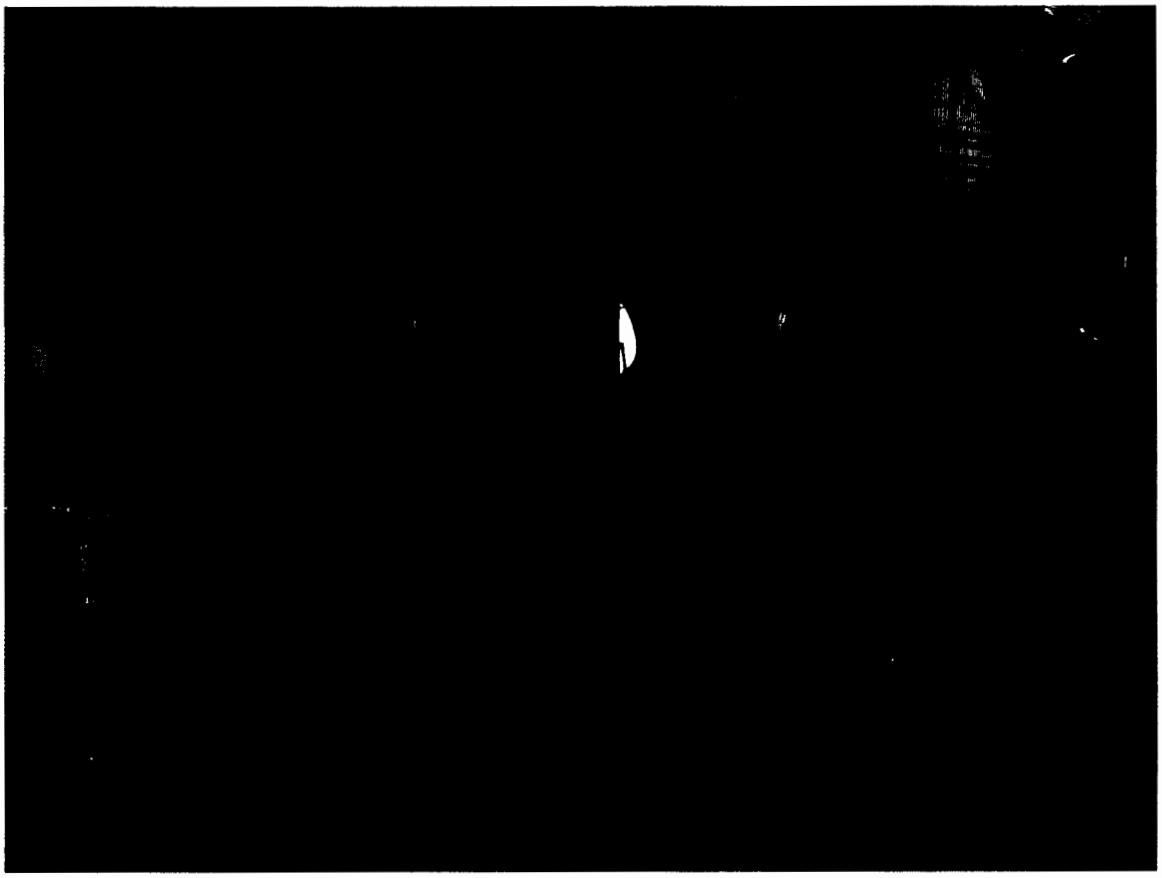
Mill scale covering floor of Closed Die Forge Shop (Wheel Mill Building)

Standard Steel
Burnham, PA
PAD061106209 PHOTO 16



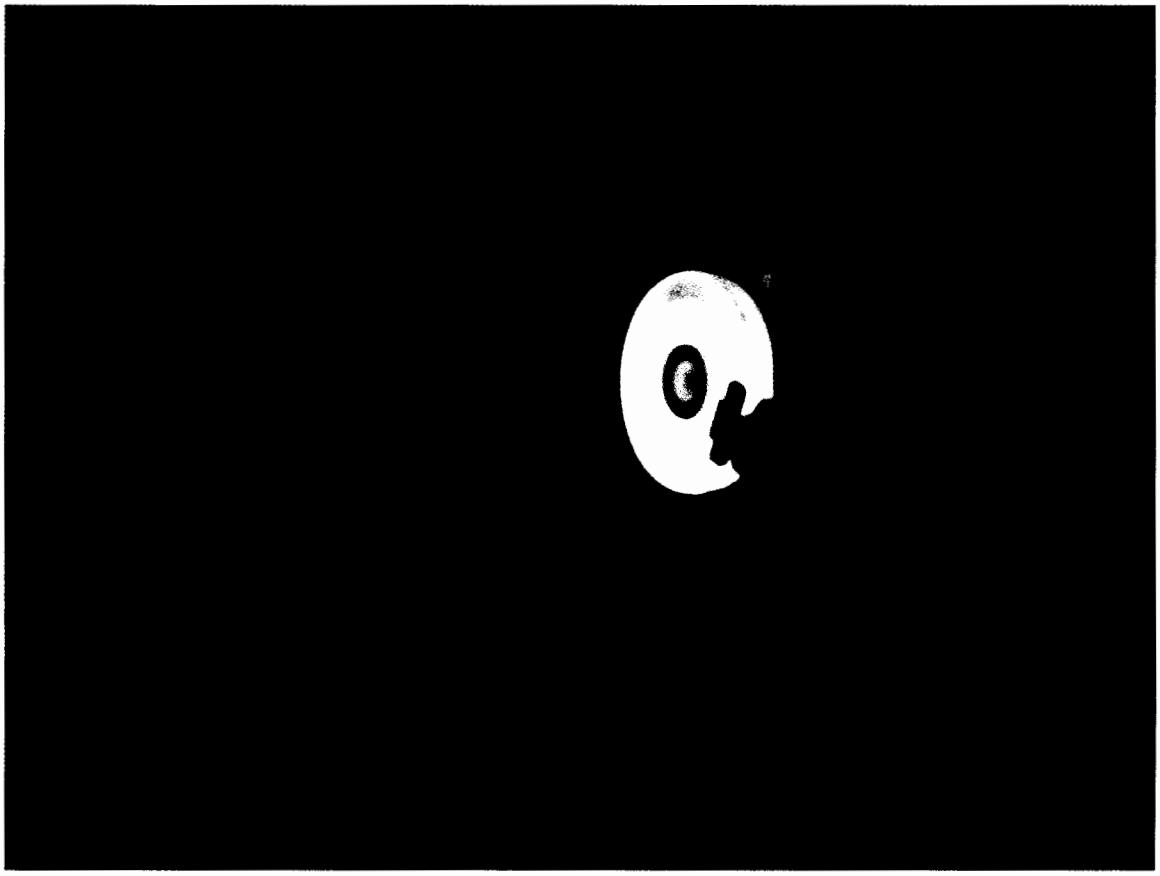
Wheel Forging Process

Standard Steel
Burnham, PA
PAD061106209 PHOTO 17



Wheel Forging Process

Standard Steel
Burnham, PA
PAD061106209 PHOTO 18



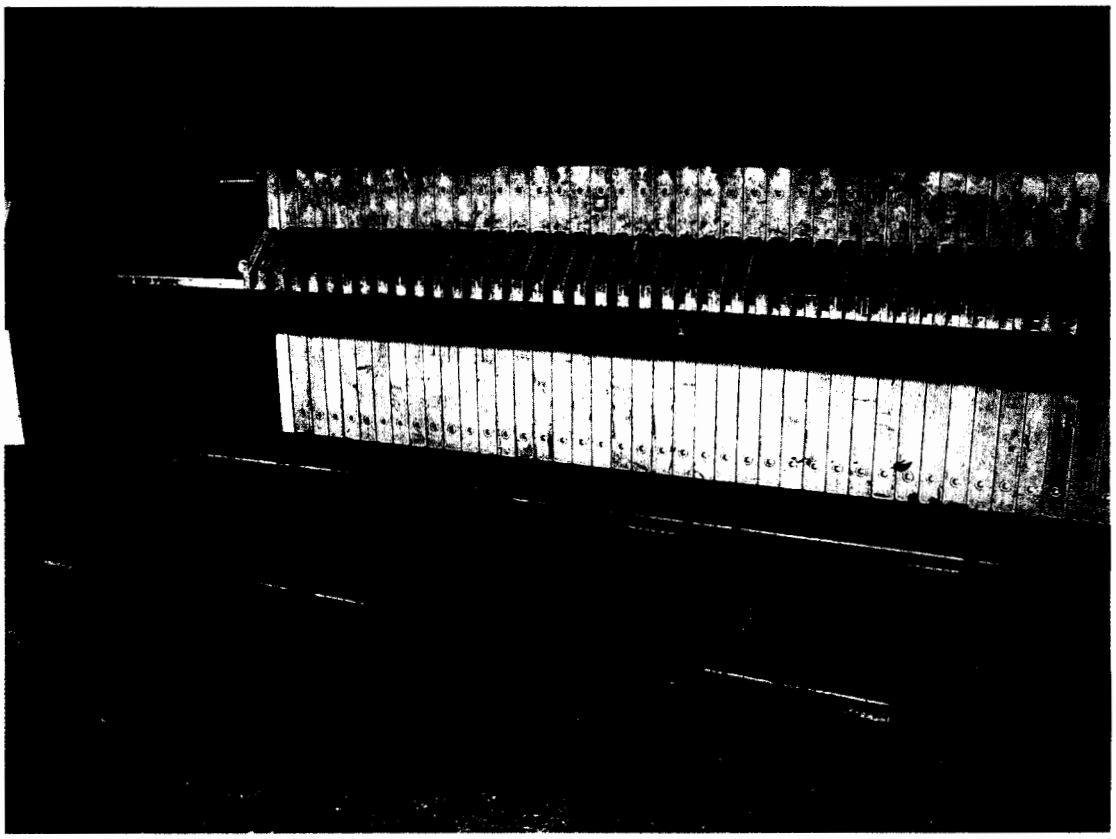
Wheel Forging Process

Standard Steel
Burnham, PA
PAD061106209

PHOTO 19

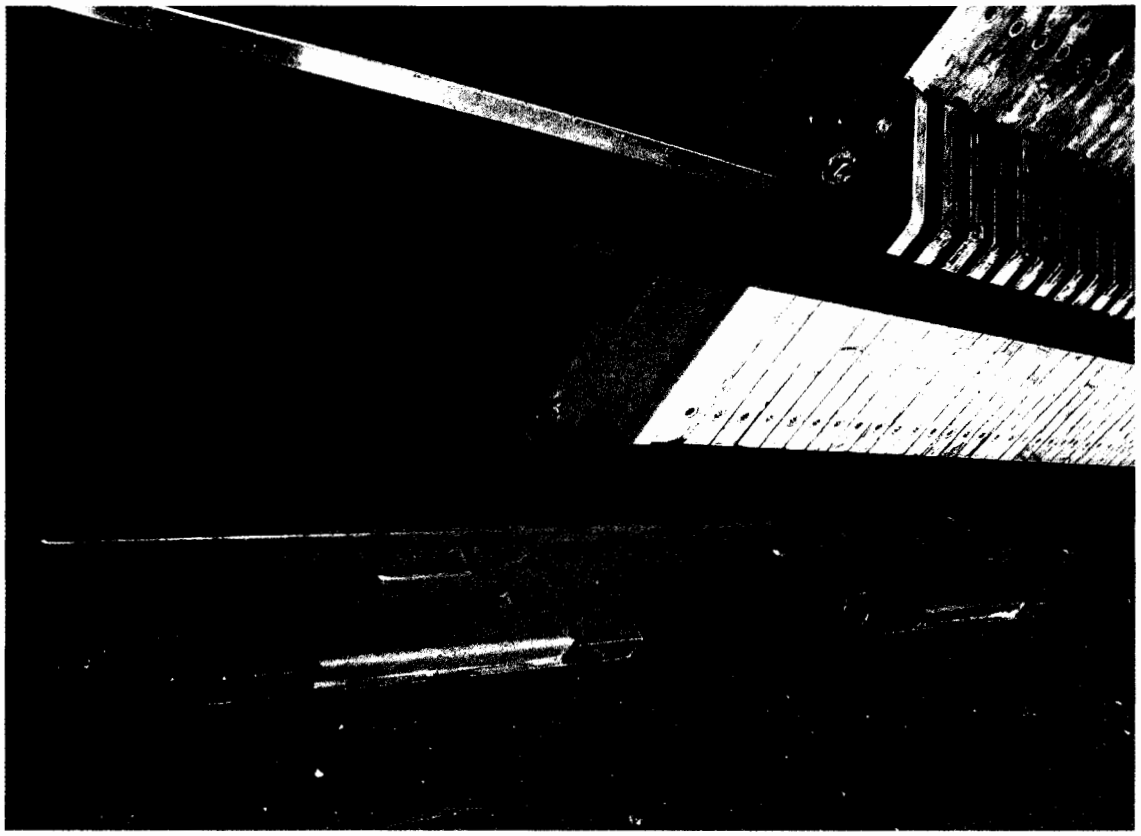
Roll-off containing sludge from Dissolved Air Flotation (DAF) Unit

Standard Steel
Burnham, PA
PAD061106209 PHOTO 20



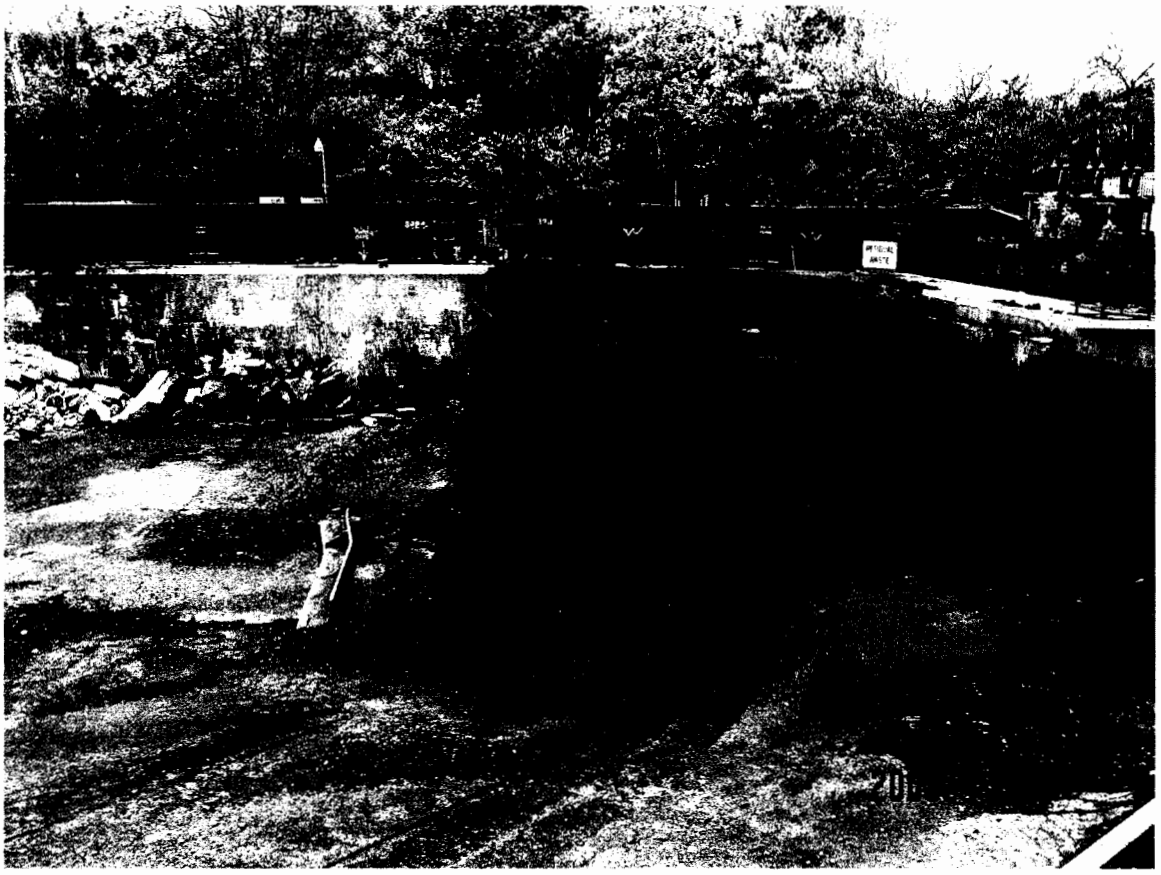
Filter press for DAF Unit

Standard Steel
Burnham, PA
PAD061106209 PHOTO 21



Collection bins beneath DAF Unit (both practically full)

Standard Steel
Burnham, PA
PAD061106209 PHOTO 22

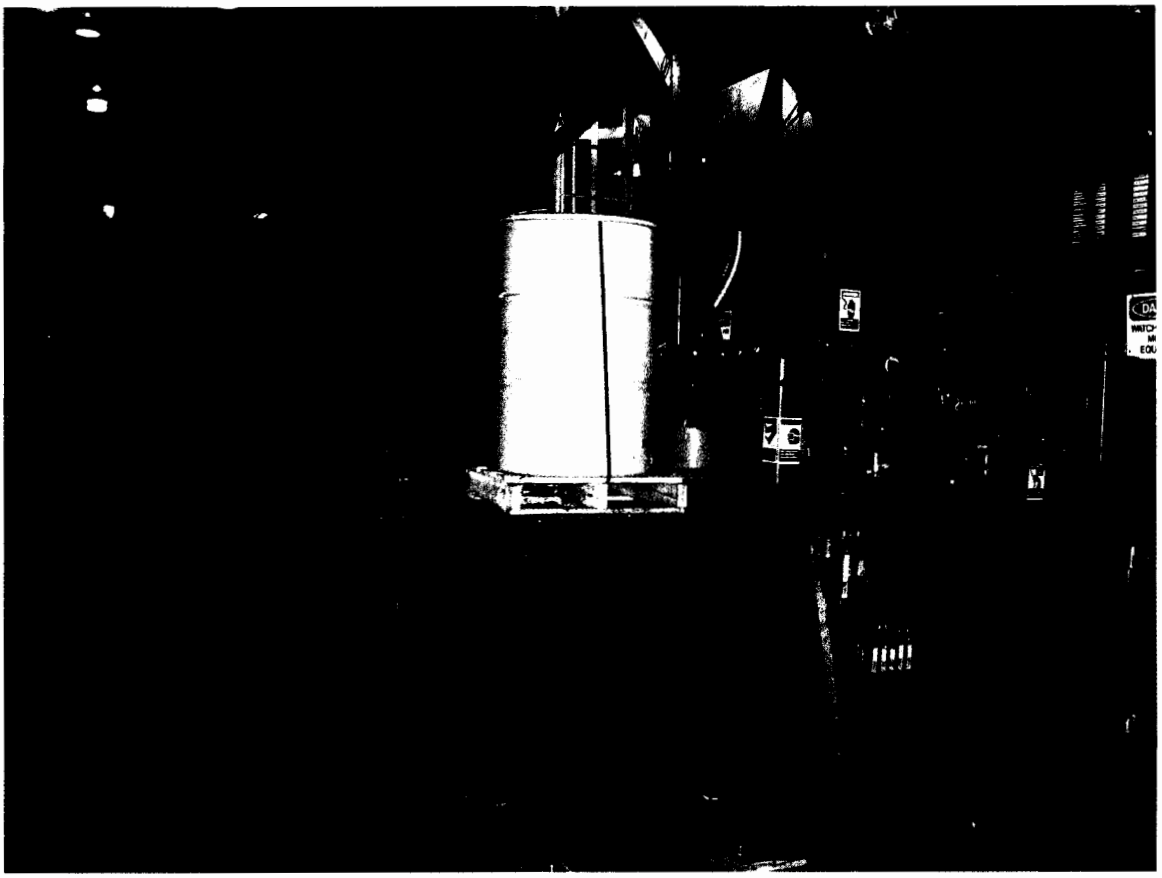


Outdoor residual waste storage area (refractory shown at left, shot blast on right)

Standard Steel
Burnham, PA
PAD061106209 PHOTO 23

Left side of outdoor storage area shown in PHOTO 22
(ballast in front left, refractory in the rear)

Standard Steel
Burnham, PA
PAD061106209 PHOTO 24



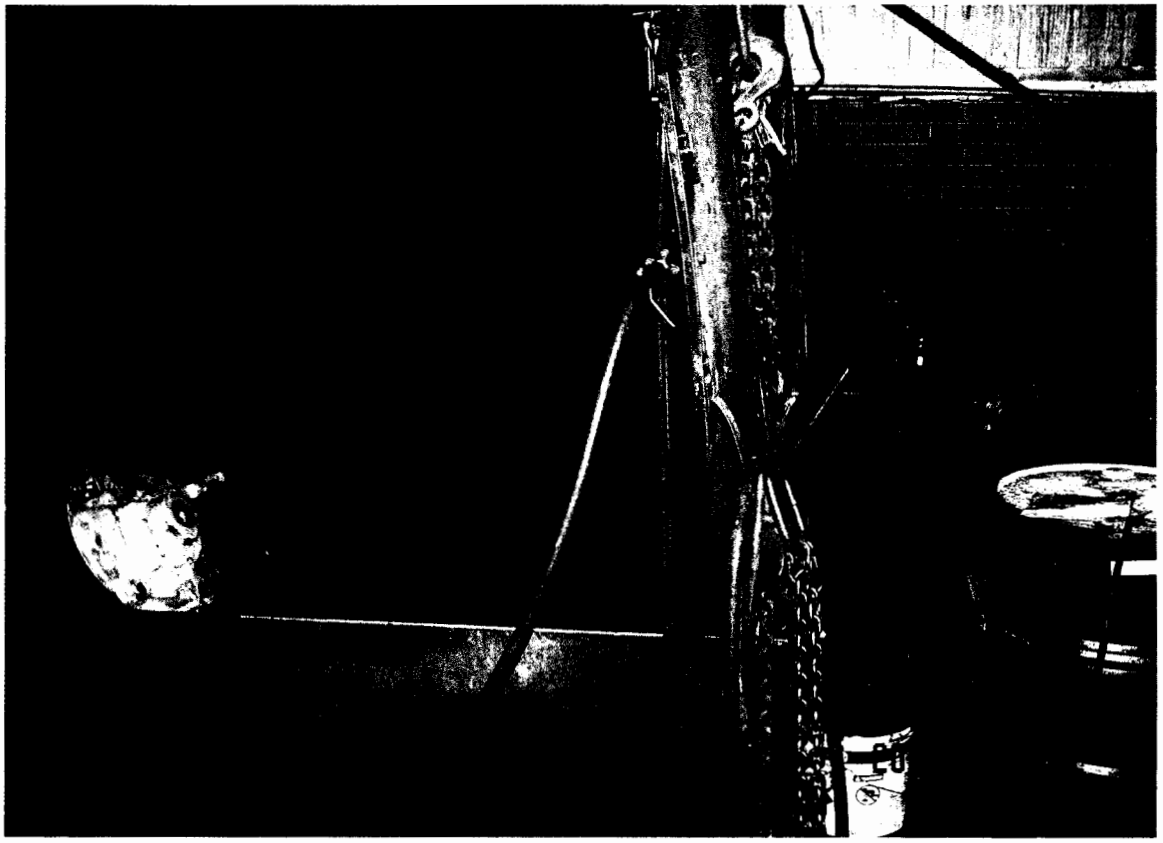
Shot Blast machines

Standard Steel
Burnham, PA
PAD061106209 PHOTO 25

55 Gal container from non- Safety Kleen operation (Marisol solvent)

Standard Steel
Burnham, PA
PAD061106209

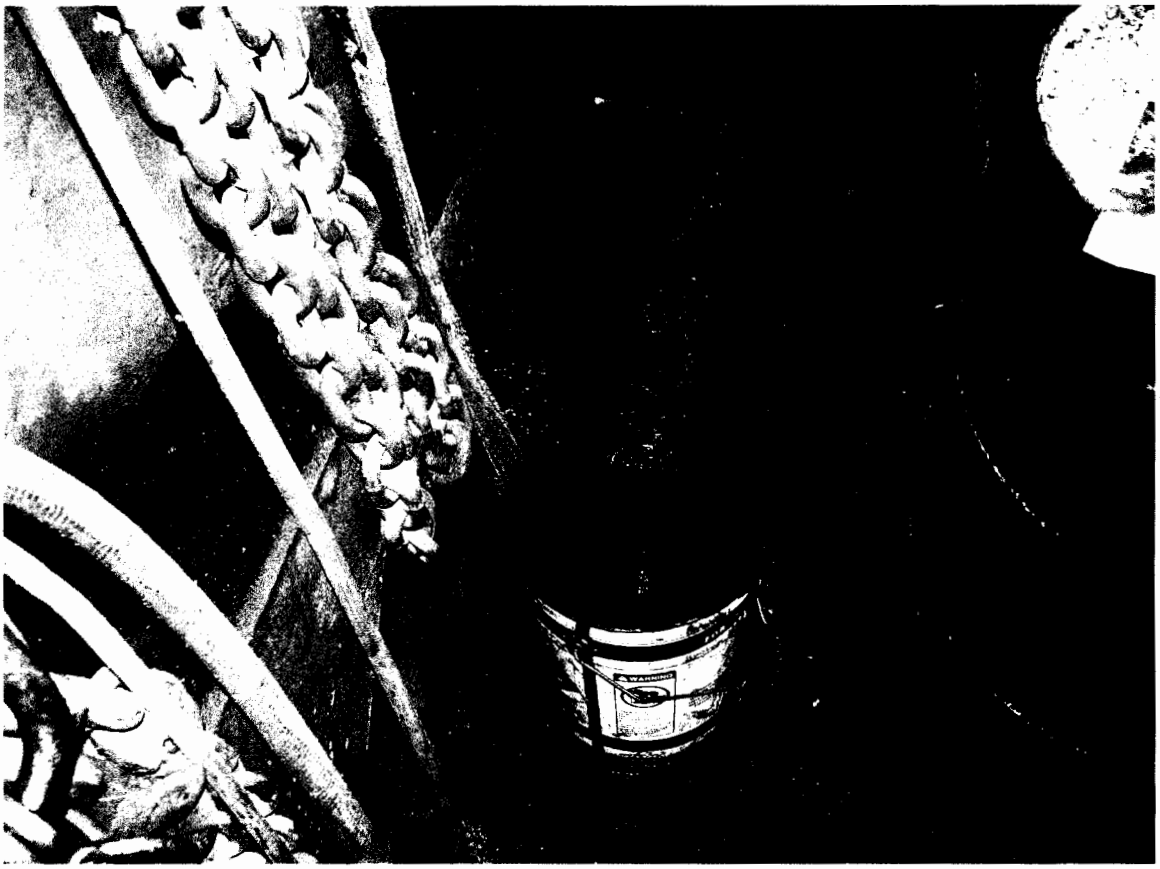
PHOTO 26



The non- Safety Kleen parts washer area

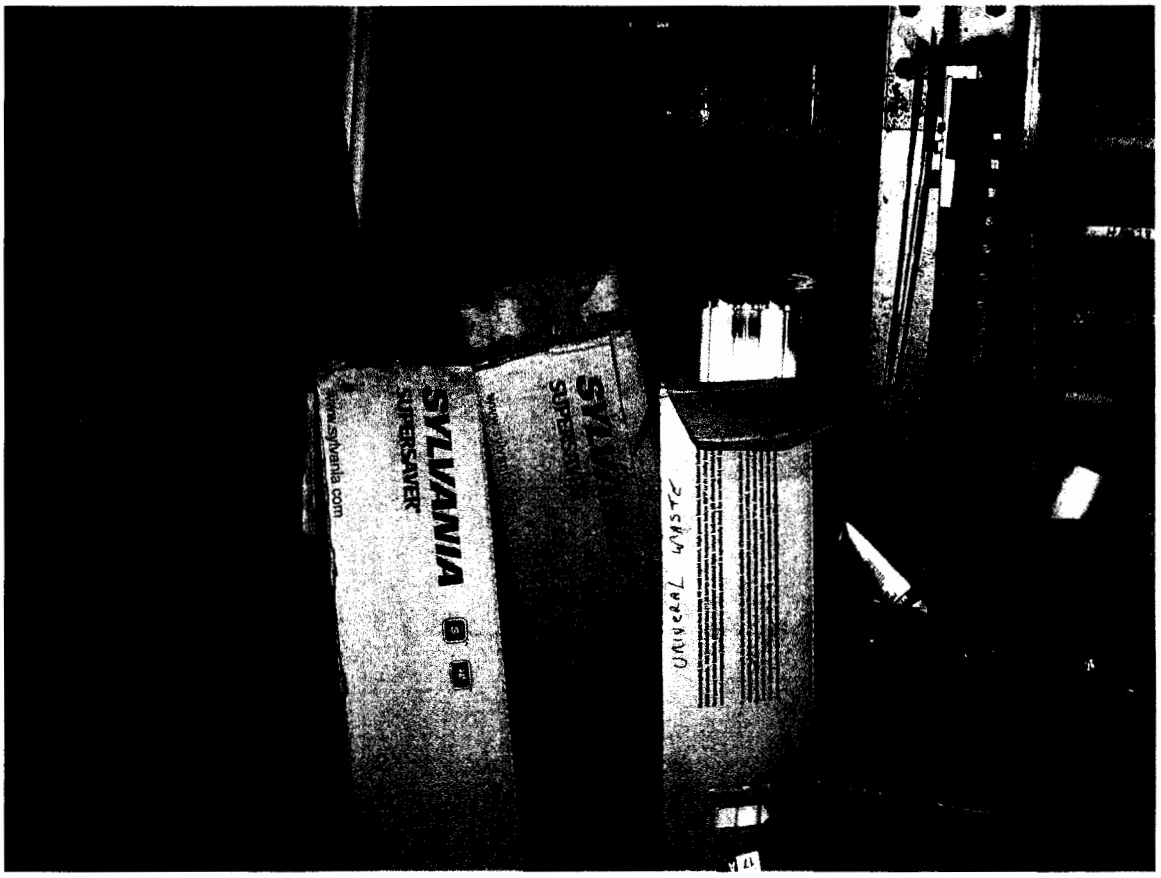
Standard Steel
Burnham, PA
PAD061106209

PHOTO 27



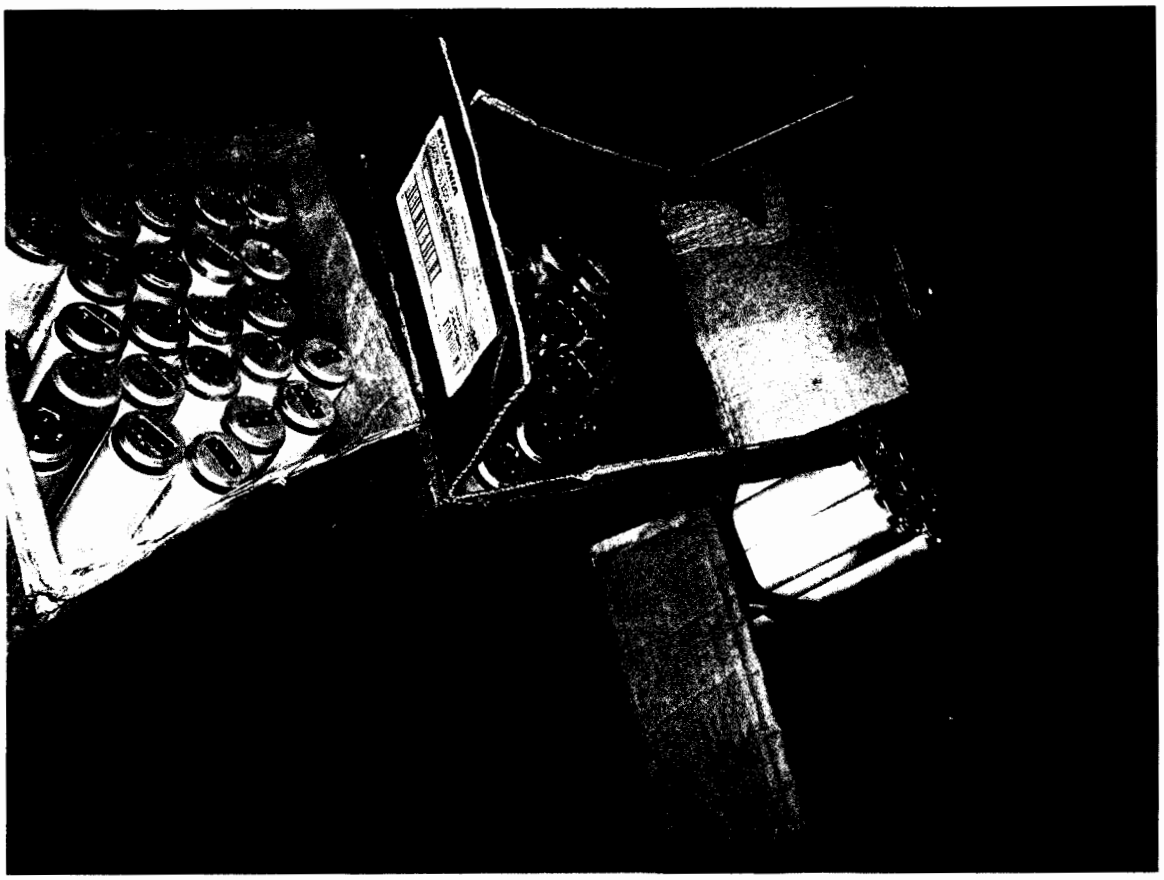
Open, unlabeled bucket which collects waste from PHOTO 26 parts washer (about 1" of liquid present)

Standard Steel
Burnham, PA
PAD061106209 PHOTO 28



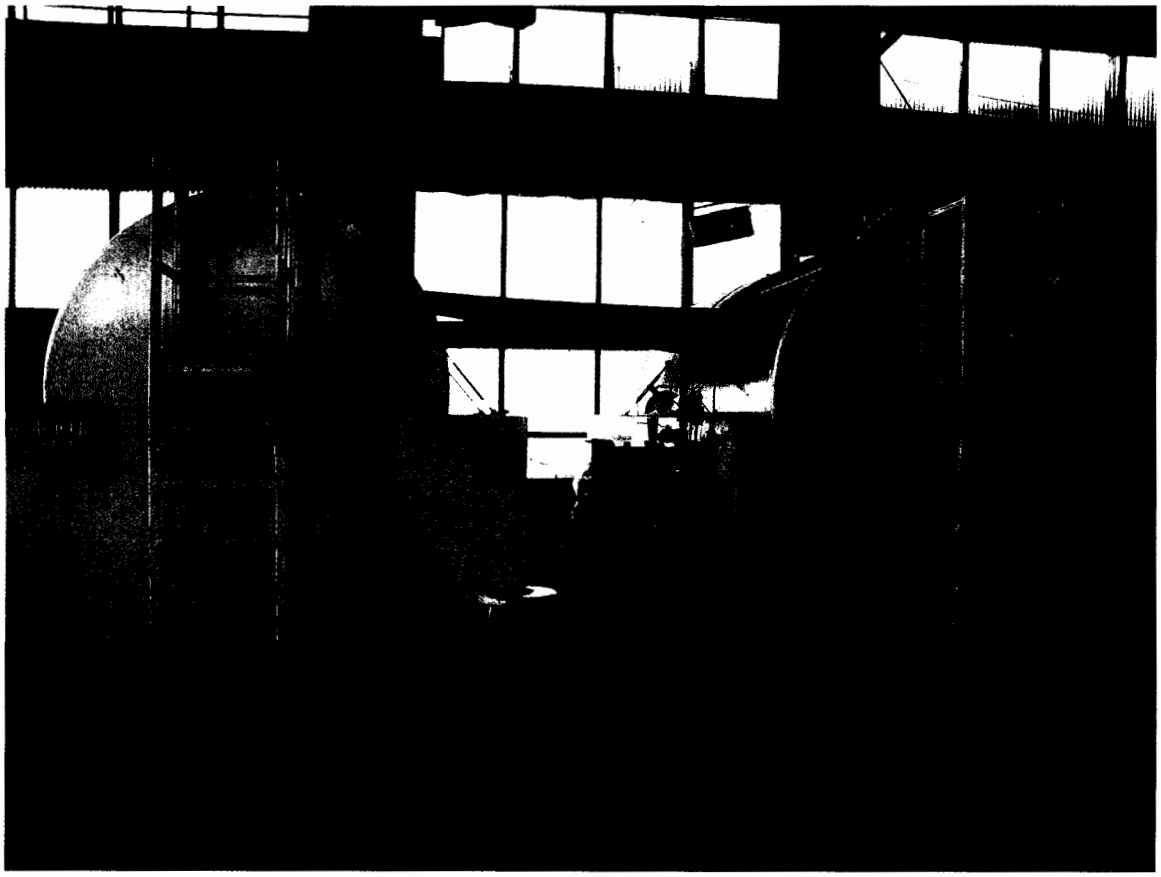
Four open and unlabeled boxes of used bulbs in Maintenance area

Standard Steel
Burnham, PA
PAD061106209 PHOTO 29



Four open and unlabeled boxes of used bulbs in the Maintenance area

Standard Steel
Burnham, PA
PAD061106209 PHOTO 30



Used Oil storage area

Standard Steel
Burnham, PA
PAD061106209 PHOTO 31

Four open 55 gal containers of unknown oily substance

Standard Steel
Burnham, PA
PAD061106209 PHOTO 32

Two of the four 55 gal containers of the unknown oily substance

Standard Steel
Burnham, PA
PAD061106209 PHOTO 33

Four open containers of unknown oily substance

Standard Steel
Burnham, PA
PAD061106209 PHOTO 34

Location of the four containers of unknown oily substance in relation to the used oil storage tanks

Standard Steel
Burnham, PA
PAD061106209 PHOTO 35

Contents of "Oily Debris" trailer found in "Forge Shop" section of Axle Building

Standard Steel
Burnham, PA
PAD061106209

PHOTO 36

Contents of "Oily Debris" trailer found in "Forge Shop" section of Axle Building

Standard Steel
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PAD061106209

PHOTO 37

Outside of "Oily Debris" trailer shown in PHOTOS 35 & 36

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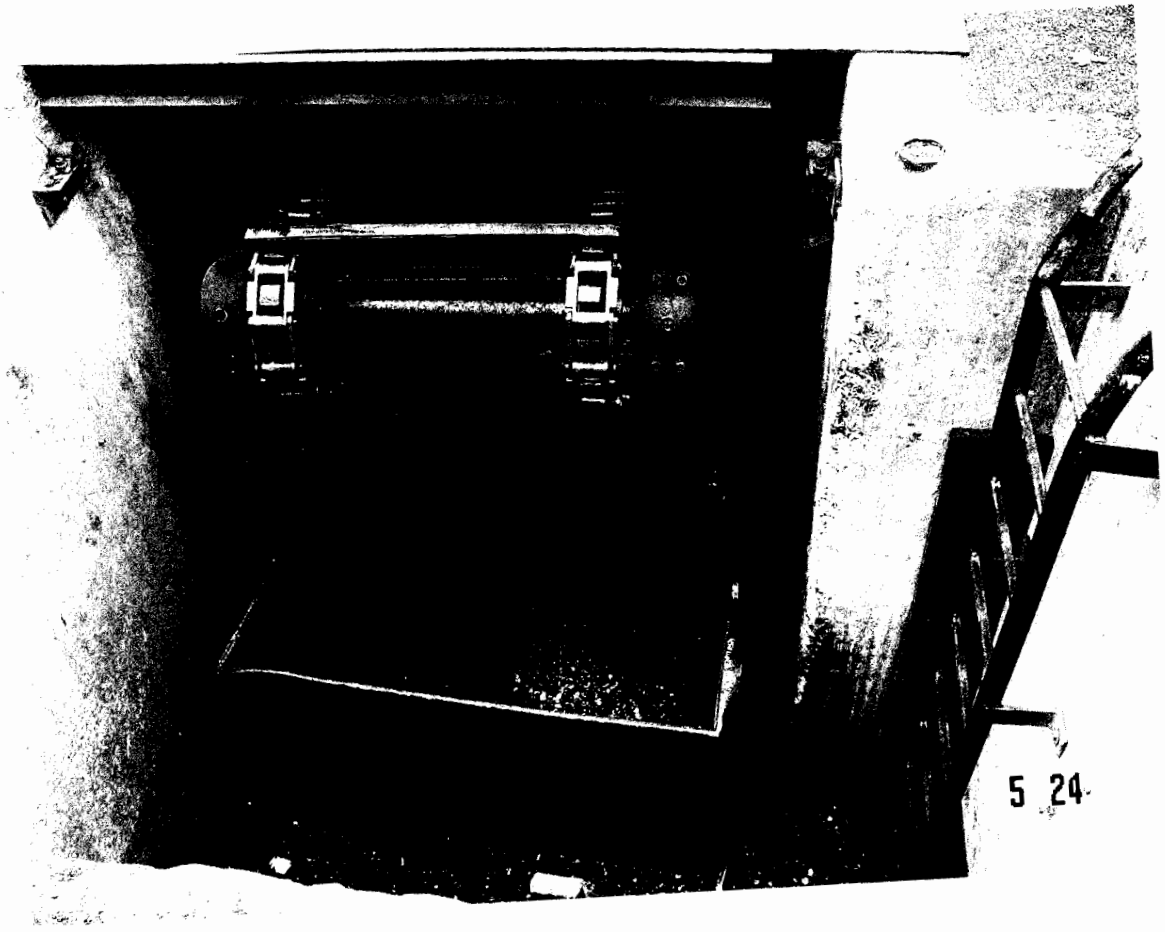
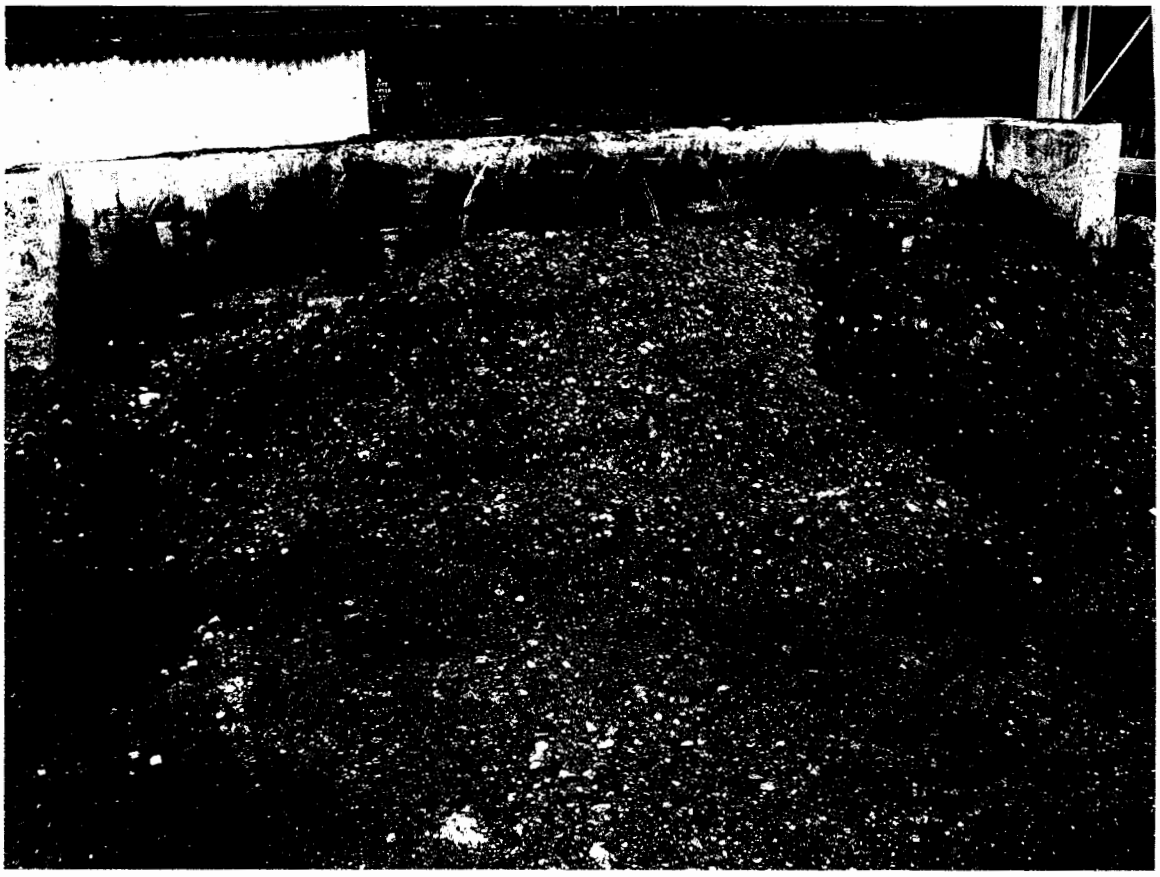
PAD061106209

PHOTO 38



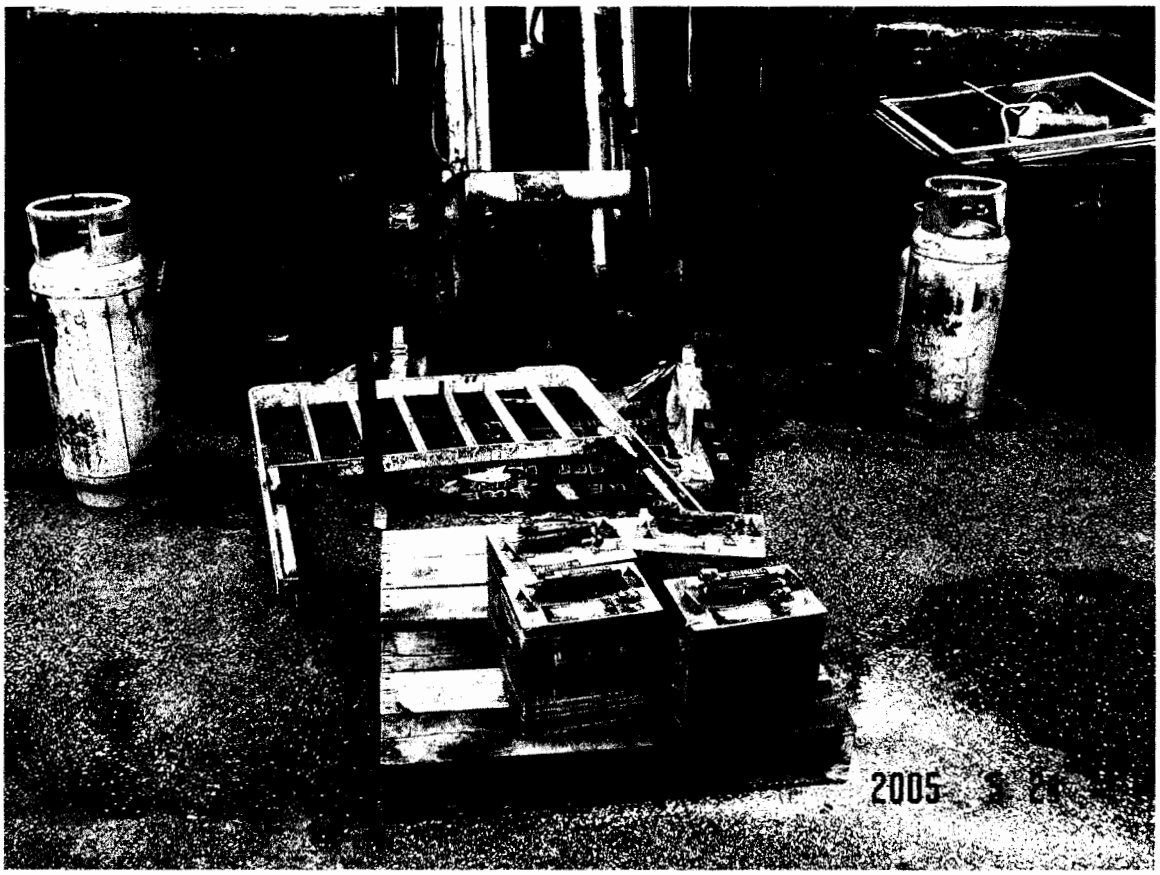
Mill scale pit from the Axle operation

Standard Steel
Burnham, PA
PAD061106209 PHOTO 39



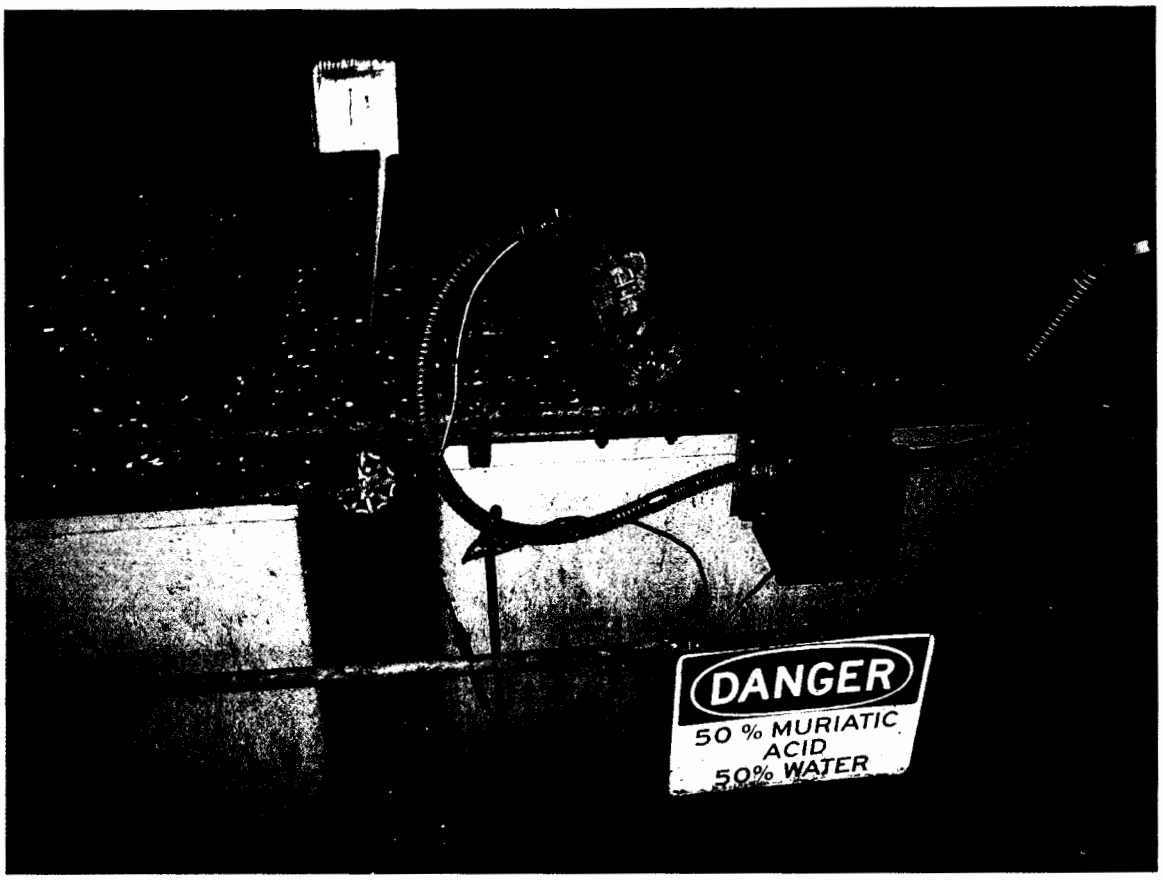
Axle mill scale pile

Standard Steel
Burnham, PA
PAD061106209 PHOTO 40



Four used batteries, not labeled, stored on pallet near maintenance garage

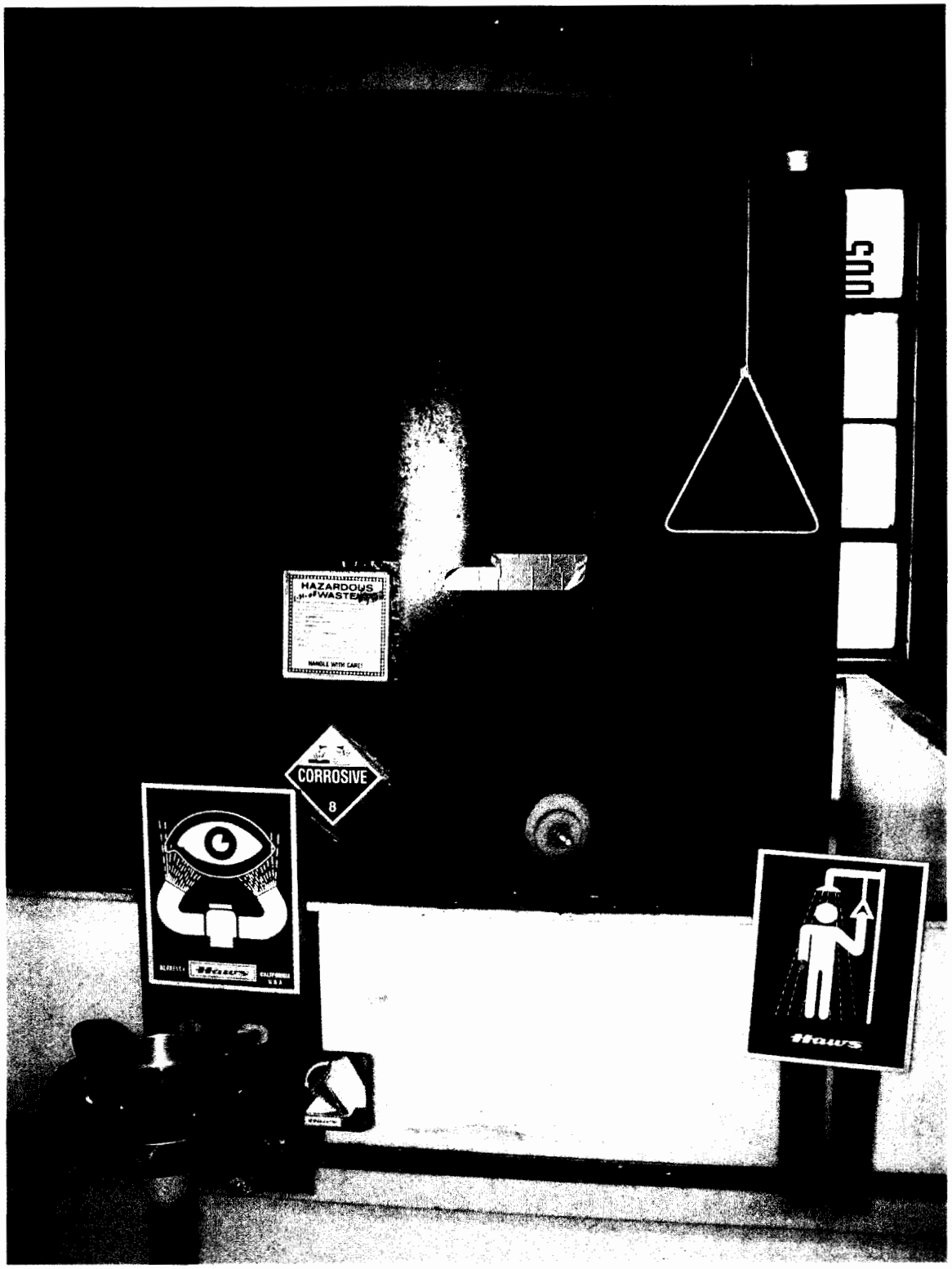
Standard Steel
Burnham, PA
PAD061106209 PHOTO 41



Etching tanks in Metallurgical Lab Annex

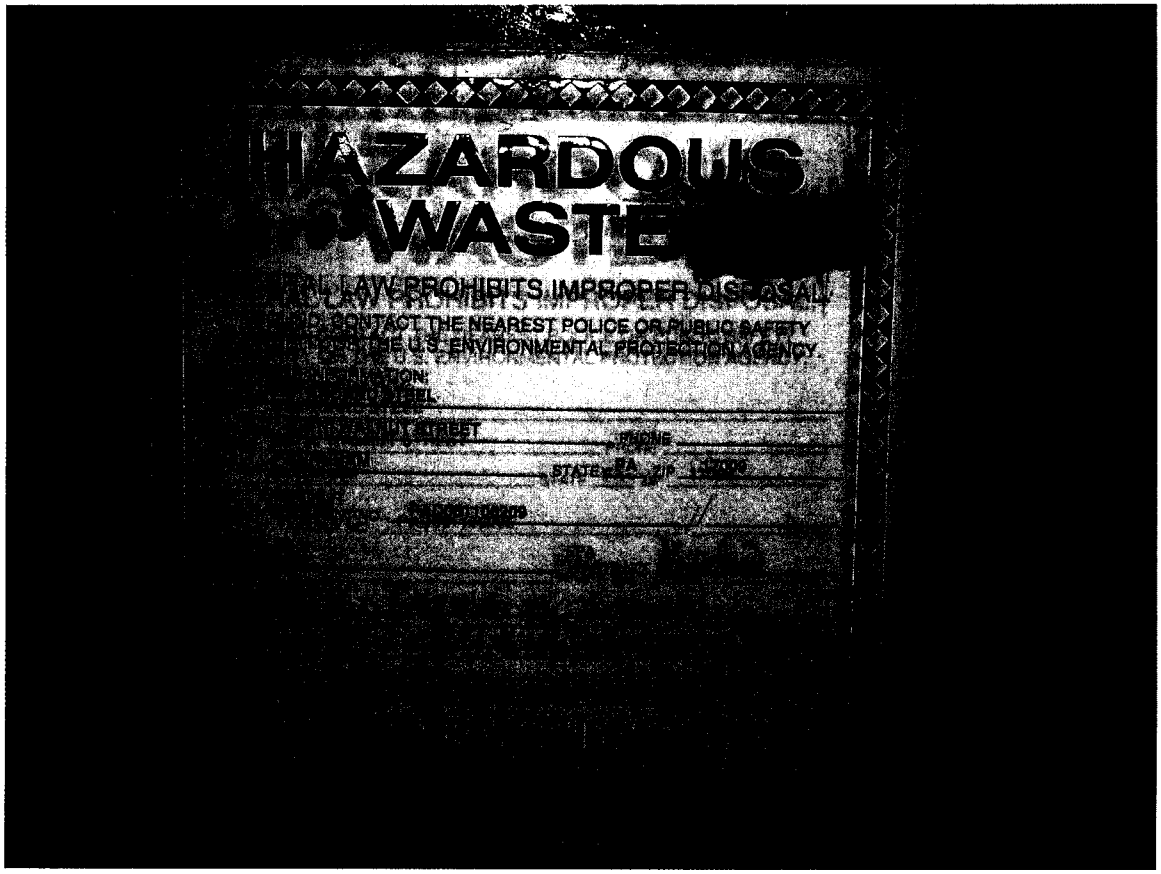
Standard Steel
Burnham, PA
PAD061106209

PHOTO 42



Waste acid tank (Empty) in Metallurgical Lab Annex

Standard Steel
Burnham, PA
PAD061106209 PHOTO 43



Close up of label on waste acid tank shown in PHOTO 42
"Waste Corrosive Liquid Acid Etching Liquid", dated 1/31/05.

ATTACHMENT 6

2510-FM-LRWM0129 Rev. 8/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection. 3/31/04 Identification Number PAD061106209

Company/Facility/Site Name Standard Steel

The 2004 Biennial Report was reviewed and volume of HW generated remains consistant with past years. The three designated HW storage areas (acid tanks, cleaning solution drum in storehouse and EAF transfer trailer @ baghouse) are all inspected separately each week.

Very little acid is generated since the rerig mill operation shut down. If the etching tanks are no longer used they will be removed, remaining waste acid will be shipped and this waste will no longer be generated.

The cast cleaner solution appears to remain non-hazardous but will continue to be manifested due to the small quantity generated.

The PPC Plan was again revised in 2/04 and copies were distributed to designated plan-holders.

To fulfil the two sign requirements for HW storage units (name of HW and "Hazardous Waste" sign), it was agreed that these two signs may be placed on the outside of the enclosure at the baghouse where the accumulation and storage units (truck/trailers) are parked.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deem to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (Signature) Blair F Edwards Date 3-31-04

Inspector (Signature Michael Unson Date 3/31/04

ATTACHMENT 7

TABLE 5-5
SPENT FOUNDRY SAND CHARACTERIZATION DATA
STANDARD STEEL, BURNHAM PLANT

		FOUNDRY SAND	FOUNDRY SAND	FOUNDRY SAND
PARAMETER	**UNITS**	**4/12/96(A)**	**4/12/96(S)**	**2/26/97(M)**
pH (1:1)	S.U.	9.53	8.91	6.07
OIL AND GREASE	mg/kg	190	-	-
ASTM:				
CHLORIDE	mg/l	<0.5	-	-
COD	mg/l	8.1	-	-
FLUORIDE	mg/l	0.11	-	-
AMMONIA (NH3-N)	mg/l	0.1	-	-
NITRITE (NO2-N)	mg/l	<0.01	-	-
NITRATE (NO3-N)	mg/l	<0.1	-	-
OIL & GREASE	mg/l	<1.0	-	-
SULFATE	mg/l	<1.0	-	-
TOTAL SOLIDS	mg/l	39	-	-
IRON	mg/l	0.05	2.0	-
MANGANESE	mg/l	<0.01	0.02	-
LEACHABLE METALS:		**TCLP**		**SPLP**
SILVER	mg/l	<0.1	-	<0.020
ARSENIC	mg/l	<0.1	-	<0.005
BARIUM	mg/l	<10	-	-
CADMIUM	mg/l	<0.1	-	<0.003
CHROMIUM	mg/l	<0.1	-	0.0060
COPPER	mg/l	<1	-	0.0175
IRON	mg/l	49	53	0.2796
MERCURY	mg/l	<0.01	-	-
MANGANESE	mg/l	<1.0	0.6	0.0439
NICKEL	mg/l	<0.1	-	0.0261
LEAD	mg/l	0.25	-	0.0018
SELENIUM	mg/l	<0.1	-	<0.005
ZINC	mg/l	<1	-	0.1214
EXTRACTION DATA:		**TCLP**		**SPLP**
Extraction fluid	-	TCLP #1	-	SPLP #1
pH with DI water	S.U.	7.1	-	-
pH after 1 N HCL	S.U.	1.5	-	-
pH of extract	S.U.	5.05	-	5.56

Table 1
General Data Table
C. D. Tower and Associates, Inc.
Antech Ltd. Project No. 96-1634
Waste Characterization

Parameter	Analytical Method	Units	Sample Identification 9604-2005 Mill Scale (4/12/96)	9604-2006 Foundry Sand (4/12/96)	9604-2007 Popcorn Slag (4/12/96)	9604-2008 Shot Blast Dust (4/12/96)
Oil & Grease	413.1[1]/9071[2]	mg/kg	470	190	80	5300
pH	9045[2]	pH units	9.26	9.53	10.51	9.60
ASTM:						
Chloride (ASTM)	9251[2]	mg/l	<0.50	<0.50	8.1	1.5
Chemical Oxygen Demand (ASTM)	410.4[1]	mg/l	<5.0	8.1	18	62
Flouride (ASTM)	9251[2]	mg/l	<0.10	0.11	0.76	0.20
Ammonia (ASTM)	350.1[1]	mg/l NH_3-N	0.11	0.10	0.10	1.1
Nitrite (ASTM)	354.1[1]	mg/l NO_2-N	<0.010	<0.010	0.024	0.30
Nitrate (ASTM)	352.1[1]	mg/l NO_3-N	<0.10	<0.10	0.35	3.2
Oil & Grease (ASTM)	413.1/9071	mg/l	<1.0	<1.0	<1.0	<1.0
Sulfate (ASTM)	9038[2]	mg/l	<1.0	<1.0	570	3.9
Total Solids @ 105°C (ASTM)	160.3[1]	mg/l	39	39	830	188
TCLP[3] Metals:						
Silver (TCLP)	6010[2]	mg/l	<0.10	<0.10	<0.10	<0.10
Arsenic (TCLP)	6010[2]	mg/l	<0.10	<0.10	<0.10	<0.10
Barium (TCLP)	6010[2]	mg/l	<10	<10	<10	<10
Cadmium (TCLP)	6010[2]	mg/l	<0.10	<0.10	<0.10	0.52
Chromium (TCLP)	6010[2]	mg/l	<0.10	<0.10	<0.10	<0.10
Copper (TCLP)	6010[2]	mg/l	<1.0	<1.0	<1.0	<1.0
Iron (TCLP)	6010[2]	mg/l	<10	49	<10	2300
Mercury (TCLP)	7470[2]	mg/l	<0.010	<0.010	<0.010	<0.010
Manganese (TCLP)	6010[2]	mg/l	<1.0	<1.0	9.3	49
Nickel (TCLP)	6010[2]	mg/l	0.31	<0.10	<0.10	0.43
Lead (TCLP)	6010[2]	mg/l	<0.10	0.25	<0.10	<0.10
Selenium (TCLP)	7740[2]	mg/l	<0.10	<0.10	<0.10	<0.10
Zinc (TCLP)	6010[2]	mg/l	<1.0	<1.0	<1.0	<1.0
TCLP Extraction Fluid Data:						
Extraction Fluid	1311[2]	-	No.1	No.1	No.1	No.2
pH with Deionized Water		pH units	6.89	7.10	9.90	9.27
pH After Addition of 1 Normal HCL		pH units	1.53	1.50	3.89	6.93
pH of TCLP Extract		pH units	4.98	5.05	6.67	6.70
Amount of Sample Extracted		g	30.0	30.0	30.0	30.0

See footnotes at end of table.

Antech Ltd.
One Triangle Drive
Export
Pennsylvania 15632
412/733-1161

General Data Table

Client: Christopher D. Tower, P.E.
Project Manager
Earth Sciences Consultants, Inc.
One Triangle Drive
Export, PA 15632

Antech Project No.: 91-0463
Receipt Date: 3/8/91
Verbal Report Date: NR
Report Date: 3/19/91

Reference: Waste Characterization; Project No. 7275-13; Standard Steel; Collected March 7, 1991

Parameter	Units	Sample Identification 03-0243 (Refractories)	03-0244 (Popcorn Slag)	03-0245 (Foundry Sand)
pH	pH units	10.84	10.56	6.36
TCLP Parameters:(1)				
Arsenic	mg/l	<0.1	<0.1	<0.1
Barium	mg/l	<10	<10	<10
Cadmium	mg/l	<0.1	<0.1	<0.1
Chromium	mg/l	<0.1	<0.1	<0.1
Lead	mg/l	<0.1	<0.1	<0.1
Mercury	mg/l	<0.01	<0.01	<0.01
Nickel	mg/l	<1	<1	<1
Selenium	mg/l	<0.1	<0.1	<0.1
Silver	mg/l	<0.1	<0.1	<0.1
Phenolics	mg/l	<0.1	<0.1	<0.1
TCLP Data:				
Initial pH	pH units	9.00	8.90	8.10
Final pH	pH units	6.10	6.00	4.75
Extraction Fluid	-	No. 1	No. 1	No. 1
Amount of Sample used for Extraction	g	100	100	100

(1) Toxicity Characteristic Leaching Procedure (TCLP) results have not been bias corrected.

Approved: Dominic F. Tozzi

Antech Ltd.
One Triangle Drive
Export
Pennsylvania 15632
412/733-1161

General Data Table

Client: Christopher D. Tower, P.E.
Project Manager
Earth Sciences Consultants, Inc.
One Triangle Drive
Export, PA 15632

Antech Project No.: 91-0463
Receipt Date: 3/8/91
Verbal Report Date: NR
Report Date: 3/19/91

Reference: Waste Characterization; Project No. 7275-13; Standard Steel; Collected March 7, 1991

Parameter	Units	Sample Identification 03-0240 (Mill Scale)	03-0241 (Shot Blast Dust)
pH	pH units	6.70	9.28
Total Petroleum Hydrocarbons	µg/g	NR(1)	NR
TCLP Metals:(2)			
Arsenic	mg/l	<0.1	<0.1
Barium	mg/l	<10	<10
Cadmium	mg/l	<0.1	<0.1
Chromium	mg/l	<0.1	<0.1
Lead	mg/l	<0.1	<0.1
Mercury	mg/l	<0.01	<0.01
Nickel	mg/l	<1	4
Selenium	mg/l	<0.1	<0.1
Silver	mg/l	<0.1	<0.1
TCLP Data:			
Initial pH	pH units	5.35	8.00
Final pH	pH units	4.75	7.20
Extraction Fluid	-	No. 1	No. 1
Amount of Sample used for Extraction	g	100	100

(1) NR = Not requested.

(2) Toxicity Characteristic Leaching Procedure (TCLP) results have not been bias corrected.

Approved:

ATTACHMENT 8

Daily Tank Inspection Record
Liquid Hazardous Waste Storage Tank

Month: May 2005

Inspection Item	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Overfill Control Operating Properly	BTE	→	→	→	→	→			BTE	→	→	→	→			BTE	→	→	→	→			BTE								
No Evidence of Corrosion or Waste Release	BTE	→	→	→	→	→			BTE	→	→	→	→			BTE	→	→	→	→			BTE								
No evidence of Waste Release or Dead Vegetation around Tank or Secondary Containment	BTE	→	→	→	→	→			BTE	→	→	→	→			BTE	→	→	→	→			BTE								
Approximate Quantity Pumped into Storage Tank:																															
From Acid Tank																															
From Rinse Tank																															

Tank inspections MUST be recorded once per day, or every 72 hours when not in operation.

WEEKLY INSPECTION RECORD
LIQUID HAZARDOUS WASTE STORAGE TANK

Month: May 2005

Inspection Item	Week Ending 5-8	5-15	5-22	5-29	
Liquid Waste in Proper Tank	BTE	BTE	BTE		
Hazardous Waste Label in Place					
Name of Liquid Marked on Label					
◆ Accumulation Start Date Marked on Label					
Container Closed					
No Evidence of Tank Leakage					
No Evidence of Tank Corrosion					
Tank Generally in Good Shape	✓	✓	✓		

◆ Contents of tank MUST be shipped out of plant for proper disposal within 90 days of accumulation start date.

Mark completed inspection box with an X

Return completed checklist to Vince Martin (x2397) - Plant Engineering

ATTACHMENT 9

WEEKLY INSPECTION RECORD
ELECTRIC ARC FURNACE DUST (K061) STORAGE TRAILER

Week Ending: 5-15-05

	Trailer ID or License #	4002		4001	
◆	Accumulation Start	5-8-05		5-11-05	
	Date Out	5-10-05		5-12-05	
Inspection Item					
EAF Dust in Proper Container		(Y)	N	(Y)	N
Hazardous Waste Marking on Trailer		(Y)	N	(Y)	N
K061 Label in Place		(Y)	N	(Y)	N
No Evidence of Trailer Leakage		Y	(N)	Y	(N)
No Evidence of Trailer Corrosion		Y	(N)	Y	(N)
Trailer Generally in Good Shape		(Y)	N	(Y)	N

◆ Contents of trailer MUST be shipped out of plant for proper disposal within 90 days of accumulation start date.

Complete one form per week

Circle completed inspection item with Y for Yes or N for No

Return completed checklist to Vince Martin (x2397) - Plant Engineering

WEEKLY INSPECTION RECORD
ELECTRIC ARC FURNACE DUST (K061) STORAGE TRAILER

Week Ending: 4/24/05

Trailer ID or License #	4006		4097	
◆ Accumulation Start	4/21/05		4/23/05	
Date Out	4/23/05		4/25/05	

Inspection Item				
EAF Dust in Proper Container	(Y)	N	Y	N
Hazardous Waste Marking on Trailer	(Y)	N	Y	N
K061 Label in Place	(Y)	N	Y	N
No Evidence of Trailer Leakage	Y	(N)	Y	N
No Evidence of Trailer Corrosion	Y	(N)	Y	N
Trailer Generally in Good Shape	(Y)	N	Y	N

◆ Contents of trailer MUST be shipped out of plant for proper disposal within 90 days of accumulation start date.

Complete one form per week

Circle completed inspection item with Y for Yes or N for No

Return completed checklist to Vince Martin (x2397) - Plant Engineering

ATTACHMENT 10

2004 / 2005 RCRA Hazardous Waste Training

On December 10, 2004 and February 8, 2005, employees whose responsibilities include management of hazardous waste at the Standard Steel Burnham Plant were provided hazardous waste management training, as required by 40 CFR 265.16. The training program was administered by Dick Decker, Safety Manager, who has been trained in hazardous waste management procedures. The primary topics covered during this classroom training were a review of the hazardous waste present at the facility, correct methods for managing these hazardous waste and a review of the Burnham Plant's Preparedness Prevention and Contingency Plan which documents emergency response procedures (detailed outline attached). This training program meet applicable requirements as set forth in 40 CFR 265.16 (a)(3).

The following is a list of employees that participated in the annual training program:

Name	Employee ID	Dept.	Haz. Waste Job Description
Roy H. Rhodes, Jr.	3313	12	C.D.F.S. Employee
Sean M. Sollers	3546	12	C.D.F.S. Employee
Jeffrey S. Sulouff	5848	20	Receiving Clerk
Keith A. Ammerman	6151	21	Internal Transportation Employee
Mike McCurdy	7568	24	Maintenance Supervisor
Don Swank	6709	24	Maintenance Supervisor
Randall S. Stimely	1910	25	Maintenance Employee
Michael T. Swanger	5711	25	Maintenance Employee
David P. Himes	8201	25	Maintenance Employee
William G. Bubb	7359	28	Maintenance Employee
Ronald G. Woodling	1824	28	Maintenance Employee
Connie L. Shilling	7279	28	Maintenance Employee
Donald L. Laub	7355	28	Maintenance Employee
Ronald R. Stoner	5662	30	Maintenance Employee
Blair F. Echard	8778	38	Manager – Plant Engineering
Bryan K. Hale	2875	46	Maintenance Employee

Stasndard Steel
Hazardous Waste Handling Training
February 8 , 2005

Training included a review of the hazardous waste streams, Toxicity, Manifests, Labels, Spills, and other emergencies. Included a review of supply location for use in clean up, safety Procedures and other necessary information.

Instructor Dick Decker

Name	Employee Number	
✓ Blair Echard	38-8778	~~[redacted]~~ MGR. ENGINEERING
✓ [illegible] Hines	25-[illegible]	
✓ Mike McCurdy	24-7568	MAINTENANCE SUPERVISOR
✓ Mike Swonger	25-5711	
✓ Bryan Hall	46-2875	
✓ Randy Stimely	25-1910	
✓ Wm Bubb	28-7359	
✓ Sean Sallee	12-3546	
✓ Roy Rhodes Jr	12-3313	

Stasndard Steel
Hazardous Waste Handling Training
December 10, 2004

Training included a review of the hazardous waste streams, Toxicity, Manifests, Labels, Spills, and other emergencies. Included a review of supply location for use in clean up, safety Procedures and other necessary information.

Instructor Dick Decker

Name	Employee Number	
Ron Stone	30-5662	MAINTENCE EMPLOYEE
Donald Faulk	28-7355	
Connie Shilling	28-7279	
Ronald Woodley	28-1824	
Keith A. Armstrong	21-6151	
J Schuff	20-5848	
D Swank	24-6709	

2003 RCRA Hazardous Waste Training

On December 12 and 15, 2003, employees whose responsibilities include management of hazardous waste at the Standard Steel Burnham Plant were provided hazardous waste management training, as required by 40 CFR 265.16. The training program was administered by Dick Decker, Safety Manager, who has been trained in hazardous waste management procedures. The primary topics covered during this class room training were a review of the hazardous wastes present at the facility, correct methods for managing these hazardous wastes and a review of the Burnham Plant's Preparedness, Prevention and Contingency Plan which documents emergency response procedures (detailed outline attached). This training program meets applicable requirements as set forth in 40 CFR 265.16(a)(3).

The following is a list of employees that participated in the annual training program.

Name	Employee ID	Dept.	Haz. Waste Job Description
Ron Stoner	5662	30	Maintenance Employee
Jeff Suloff	5848	20	Maintenance Employee
Todd Olnick	8271	24	Maintenance Supervisor
Tom Harris	7157	21	Maintenance Employee
Larry Whistler	6947	25	Maintenance Employee
Allan Platzer	3925	30	Maintenance Employee
Richard Smith	5603	10	Melt Shop Employee
Robert Walters	2626	57	Maintenance Employee
Paul Rowles	5921	26	Maintenance Employee
Don Swank	6709	24	Maintenance Supervisor
Tim Armstrong	5379	24	Maintenance Supervisor
Don Wagner	5768	24	Maintenance Supervisor
Terry Zook	4658	24	Maintenance Supervisor
Michael Spahr	1937	25	Maintenance Employee
Earl Pecht	5627	31	Maintenance Employee
Allen Myers	5718	21	Maintenance Employee
Don DeArment	8799	58	AFM Supervisor
Robert Murrell	7928	24	Maintenance Supervisor
Frank Brinton	3065	24	Maintenance Supervisor
Blair Echard	8778	38	Engineering Manager
Mike McCurdy	7568	25	Maintenance Supervisor

2002 RCRA Hazardous Waste Training

On December 10, 2002, employees whose responsibilities include management of hazardous waste at the Standard Steel Burnham Plant were provided hazardous waste management training, as required by 40 CFR 265.16. The training program was administered by Dick Decker, Safety Manager, who has been trained in hazardous waste management procedures. The primary topics covered during this class room training were a review of the hazardous wastes present at the facility, correct methods for managing these hazardous wastes and a review of the Burnham Plant's Preparedness, Prevention and Contingency Plan which documents emergency response procedures (detailed outline attached). This training program meets applicable requirements as set forth in 40 CFR 265.16(a)(3).

The following is a list of employees that participated in the annual training program.

Name	**Employee ID**	**Dept.**	**Haz. Waste Job Description**
Russell Gers	6930	25	Maint. Employee
Allan Platzer	3925	30	Maint. Employee
Lon Goss	7357	41	Security Employee
Dwayne Crum	7593	25	Maint. Employee
Neil Spigelmyer	6692	25	Maint. Employee
Ronald Stoner	5662	30	Maint. Employee
Rob Boyer	6095	15	MS#1 Supervisor
Larry Whistler	6947	25	Maint. Employee
Mike McCurdy	7568	25	Maint. Supervisor
Matt Barnett	5779	46	Maint. Employee
Danny Kline	4773	15	MS#1 Supervisor
Norman Miller	7382	57	Maint. Employee
Charles Bair	6938	25	Maint. Employee
Danny Bollinger	7089	25	Maint. Employee
Steve Seby	7522	31	Maint. Employee
Donald Wagner	5768	15	MS#1 Supervisor
Donald Swank	6709	15	MS#1 Supervisor
Allen Myers	5718	21	Maint. Employee
Frederick Barraclough	7236	25	Maint. Employee
Donald Adair	6632	26	Maint. Employee
Ronald Searer	1396	10	Melt Shop Employee
Dean Dressler	5362	23	Maint. Employee
Jerry Casner	4596	15	MS#! Foreman
Charles Hockenberry	3285	25	Maint. Employee
Robert Murrell	7928	24	Maint.Supervisor
Mike Petroski	1073	11	Ring Mill Supervisor
Frank Brinton	3065	24	Maint. Supervisor
Donald McCoy	2664	15	MS#1 Supervisor
Tim Armstrong	5379	24	Maint. Supervisor
Ron Benton	5901	15	MS#1 Supervisor
Jeff Suloff	5848	20	Maint. Employee
Don DeArment	8799	55	AFM Supervisor

2001 RCRA Hazardous Waste Training

On January 23, 2001, employees whose responsibilities include management of hazardous waste at the Standard Steel Burnham Plant were provided hazardous waste management training, as required by 40 CFR 265.16. The training program was administered by Vince Martin, Environmental Engineer, a practicing environmental professional who has been trained in hazardous waste management procedures. The primary topics covered during this classroom training were a review of the hazardous wastes present at the facility, correct methods for managing these hazardous wastes and a review of the Burnham Plant's Preparedness, Prevention and Contingency Plan which documents emergency response procedures (detailed outline attached). This training program meets applicable requirements, as set forth in 40 CFR 265.16(a)(3).

The following is a list of employees that participated in the annual training program:

Name	Employee ID	Dept	Haz Waste Job Descr
Mike McCurdy	7568	24	Maint. Supervisor
George McCallips	2646	29	Maint. Employee
Roger Howell	7591	25	Maint. Employee
Bernie Bynon	6543	24	Maint. Supervisor
Larry Wise	7098	25	Maint. Employee
Chris Kline	5907	25	Maint. Employee
Dennis Bowen	7109	23	Maint. Employee
C. William Minium	7094	24	Maint. Employee
Ron Stoner	5662	30	Maint. Employee
Paul Boyer	6845	28	Maint. Employee
Connie Shilling	7279	28	Maint. Employee
Larry Whistler	6919	29	Maint. Employee
William Bubb	7359	28	Maint. Employee
Brian Kelly	6714	28	Maint. Employee
Jim Whistler	7360	28	Maint. Employee
Don Laub	7355	28	Maint. Employee
Harold Grydon	1623	28	Maint. Employee
Richard Yorks	7419	26	Maint. Employee
Marlin Johnson	6441	22	Maint. Supervisor
Terry Zook	4658	24	Maint. Supervisor
Tim Winters	6436	24	Maint. Supervisor
Robert Murrell	7928	24	Maint. Supervisor
Tom Betlyon	4769	31	Maint. Employee
Dick Decker	3834	42	Maint. Supervisor
Earl Pecht	5627	31	Maint. Employee
Lon Goss	7357	41	Plant Security
Matthew Barnett	5779	46	Maint. Employee
William Wagner	4749	22	Maint. Employee
Harold Aitken	5196	24	Maint. Employee

ATTACHMENT 11

2004 Hazardous Waste Training

Standard Steel

12/9/04 1

Goal of Training

- Reduce exposure
- Understanding of wastes
- Compliance with regulations
- Ensure Worker Safety

2

Types and Hazards of Waste Generated

- IGNITABILITY: Flash point < 140 F (D001)
- CORROSIVITY: pH<2 or >12.5 (D002)
- REACTIVITY: React violently w/water (D003)
- TOXICITY: Contaminants above threshold

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Toxicity Examples

EPA HW No.	Contaminant	CAS No.	Reg. Level mg/l
D006	Cadmium	7440-43-9	1.0
D007	Chromium	7440-47-3	5.0
D008	Lead	7439-92-1	5.0
D018	Benzene	71-43-2	0.5
D039	Tetrachloroethylene	127-18-4	0.7
D040	Trichloroethylene	79-01-6	0.5

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Primary Hazardous Wastes

- EAF Dust - K061
  - Average 2,000 tons per year
- Spent Parts Cleaning Solvent
  - Safety Kleen parts washer
  - Electric shop (Spent Mineral Spirits)
- Acid Etching Waste - K062
- Asbestos
- Other Minor Hazardous Wastes

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Non-Hazardous Wastes

- Solid wastes from the Melt Shop
- Waste Oil and Waste Water
- Sludges
- Ceramic Fiber
- Municipal Wastes

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Hazardous Waste Storage

- Store on-site for MAX of 90 days
- EAF Dust
  - Lined trailers
- Safety Kleen Solvent
  - Serviced by Safety Kleen tech

7

Storage & Transportation

- Waste Storage
- Waste Transportation

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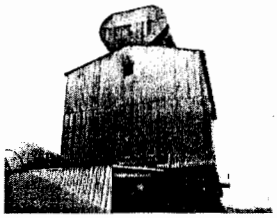
Air Pollution Control Equipment

- Bag Houses



9

Hazardous Waste Storage

- Store on-site for MAX of 90 days
- EAF Dust
  - Lined trailers
- Safety Kleen Solvent
  - Serviced by Safety Kleen tech
- Electric Shop Solvent
  - DRU-12
- Acid Etch Waste
  - Storage tank in TPC

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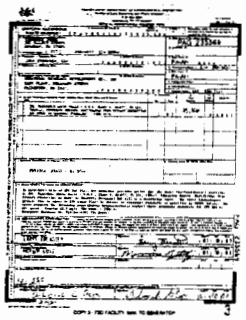
Hazardous Waste Manifest



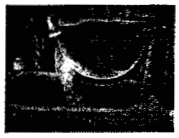
11

Containers Need Proper Labels

12

Melt Shop Baghouse

- Control EAF Dust
- Notify immediately if there is a malfunction!



13

Empty Lectro-Clean Cans & Scrap Florescent Light Bulbs

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Sampling Procedures

- Solid Waste Shipments (EAF Dust Checked 1/Month by Horsehead Refining)
- Liquid Waste Shipments
- All Hazardous wastes must be analyzed every 5 years.

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Spills and Other Emergencies

- In the event of a spill
  - Contain spill
- Significant Emergency
  - Follow procedures and notification of PPC Plan
    - Copies in Guard House, Maint, Transp, Plant Eng.

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Reaction to Spills

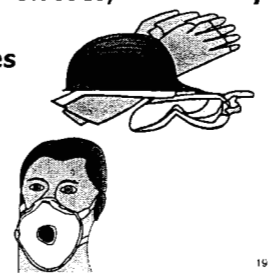
17

Read the Label or MSDS

18

Wear Proper Safety Equipment

- Hard Hat, Safety Glasses, and Safety Shoes
- Protective Gloves
- Tyvek Suits?
- Dust Respirator



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Emergency Equipment & Supplies

- Over Pack Drums
- Absorbents
- 17E Drum (Stores Drum 12)

20

Over Packs

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House Keeping Storage Areas

- Drums Stored on Containment Skids.
- EAF Dust - Keep Concrete Pad Clean.

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Contingency Plan Review

- Security
- Employee Response

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Questions?

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